

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

	§	
	§	Chapter 11
	§	
	§	Case No. 25-40976-357
	§	
In re:	§	(Jointly Administered)
	§	
	§	Hearing Date: June 17, 2025
23ANDME HOLDING CO., et	§	Hearing Time: 9:00 AM CT
al.,	§	Hearing Location:
	§	
	§	Thomas F. Eagleton
Debtors.	§	U.S. Courthouse
	§	111 S. 10 th Street
	§	Courtroom 5 North
	§	St. Louis, MO 63102

**DECLARATION OF JAMI MILLS VIBBERT IN SUPPORT OF TTAM'S
OMNIBUS REPLY IN SUPPORT OF ENTRY OF THE SALE ORDER**

I, Jami Mills Vibbert, declare as follows:

1. I am a partner at the law firm Arnold & Porter Kaye Scholer LLP. I am a member in good standing of the Bar of the State of New York. I am privacy counsel for bidder TTAM Research Institute ("TTAM") in this proceeding. I submit this declaration in support of TTAM's Omnibus Reply In Support of Entry Of The Sale Order. I have personal knowledge of the matters described herein and could testify to them if called upon to do so.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a printout of the webpage <https://www.23andme.com/legal/privacy/full-version/> as of June 11, 2025. This webpage, titled "Privacy Statement," contains 23andMe's current privacy statement, which was last updated on March 14, 2025. Under the subheading "Commonly owned entities, affiliates and change of ownership," it states, "[i]f we are involved in a bankruptcy, merger, acquisition, reorganization, or

sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services."

3. Attached hereto as **Exhibit 2** is a true and correct copy of a printout of the webpage <https://www.23andme.com/legal/privacy/full-version/7.3> as of June 11, 2025. This webpage, titled "Privacy Statement," is a prior version of 23andMe's privacy statement and was last updated on September 24, 2024. Under the subheading "Commonly owned entities, affiliates and change of ownership," it states, "[i]f we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services."

4. Attached hereto as **Exhibit 3** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/privacy/full-version/> as of June 11, 2025. This webpage is titled "Privacy Statement" and was obtained from a September 20, 2024 capture by the Internet Archive of the contents of a webpage from 23andMe's website. This document is a set of privacy practices 23andMe posted to its webpage and last updated on October 4, 2023. Under the subheading "Commonly owned entities, affiliates and change of ownership," it states, "[i]f we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services."

5. Attached hereto as **Exhibit 4** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/privacy/full-version/> as of June 11, 2025. This webpage is titled “Privacy Statement” and was obtained from a September 15, 2023 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document is a set of privacy practices 23andMe posted to its webpage and last updated on December 14, 2022. Under the subheading “Commonly owned entities, affiliates and change of ownership,” it states, “[i]f we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates’ services.”

6. Attached hereto as **Exhibit 5** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/privacy/full-version/> as of June 11, 2025. This webpage is titled “Privacy Statement” and was obtained from a September 9, 2022 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document is a set of privacy practices 23andMe posted to its webpage and last updated on June 8, 2022. Under the subheading “Commonly owned entities, affiliates and change of ownership,” it states, “[i]f we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates’ services.”

7. Attached hereto as **Exhibit 6** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/>

as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a June 3, 2022 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and last updated on February 3, 2022. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

8. Attached hereto as **Exhibit 7** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a January 31, 2022 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and last updated on January 25, 2022. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

9. Attached hereto as **Exhibit 8** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20220124204105/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a January 24, 2022 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and last updated on October 30, 2020. Under the subheading “Business Transactions,” it states, “[i]n the

event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

10. Attached hereto as **Exhibit 9** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20201030011505/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a October 30, 2020 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and had an effective date of January 1, 2020. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

11. Attached hereto as **Exhibit 10** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20191216212256/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a December 16, 2019 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on September 30, 2019. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

12. Attached hereto as **Exhibit 11** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20190922165559/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a September 22, 2019 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on August 22, 2018. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

13. Attached hereto as **Exhibit 12** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20180820183119/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from an August 21, 2018 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on July 17, 2018. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

14. Attached hereto as **Exhibit 13** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a June 14, 2018 capture by the Internet Archive of the contents of a webpage from 23andMe’s

website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on May 24, 2018. Under the subheading “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

15. Attached hereto as **Exhibit 14** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20180509185352/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a May 9, 2018 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on September 29, 2016. Under the subheading “Consent to the Transfer of Your Personal Information” it states, “You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.” Under another subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

16. Attached hereto as **Exhibit 15** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20160913052850/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a September 13, 2016 capture by the Internet Archive of the contents of a webpage from 23andMe’s

website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on December 7, 2015. Under the subheading “Consent to the Transfer of Your Personal Information” it states, “[y]ou also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.” Under another subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

17. Attached hereto as **Exhibit 16** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20151015182035/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a October 15, 2015 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on July 14, 2015. Under the subheading “Consent to the Transfer of Your Personal Information” it states, “You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.” Under another subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

18. Attached hereto as **Exhibit 17** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20150623195145/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a June 23, 2015 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on November 13, 2014. Under the subheading “Consent to the Transfer of Your Personal Information” it states, “You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.” Under another subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

19. Attached hereto as **Exhibit 18** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20140708030534/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a July 8, 2014 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on March 25, 2013. Under the subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

20. Attached hereto as **Exhibit 19** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20130112222500/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a January 12, 2013 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on November 1, 2012. Under the subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

21. Attached hereto as **Exhibit 20** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20120418233040/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a April 18, 2012 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on December 1, 2011. Under the subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

22. Attached hereto as **Exhibit 21** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20111006093620/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from an October 6, 2011 capture by the Internet Archive of the contents of a webpage from 23andMe’s

website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on June 24, 2010. Under the subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.”

23. Attached hereto as **Exhibit 22** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20081113224231/https://www.23andme.com/about/privacy/> as of June 11, 2025. This webpage contains the title “Full Privacy Statement,” and was obtained from a November 13, 2008 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of privacy practices 23andMe posted to its webpage and was last updated on November 11, 2007. Under the subheading, “Business Transactions,” it states, “[i]n the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information and non-personal information will likely be among the assets transferred. You will be notified in advance via email and prominent notice on our website of any such change in ownership or control of your personal information. We will require an acquiring company or merger agreement to uphold the material terms of this privacy statement, including honoring requests for account deletion.”

24. Attached hereto as **Exhibit 23** is a true and correct copy of a printout of the webpage <https://www.23andme.com/legal/us-privacy/> as of June 11, 2025. This webpage, titled “Privacy Notice for U.S. State Residents,” contains 23andMe’s current privacy notice, last updated March 15, 2024, applicable to:

residents of California, Washington, Colorado, Virginia, Utah, and Connecticut and contains information required by the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, the Colorado Privacy Act (“CPA”), the Virginia Consumer Data Protection Act (“VCDPA”), the Utah Consumer Privacy Act (“UCPA”), the Washington My Health My Data Act (“MHMDA”), and the Connecticut Data Privacy Act (“CTDPA”) (collectively, “U.S. State Data Protection Laws”).

Under the “Summary” heading it notifies users of their following rights

- “You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.”

25. Attached hereto as **Exhibit 24** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20240312014101/https://www.23andme.com/legal/us-privacy/> as of June 11, 2025. This webpage is titled “Privacy Notice for U.S. State Residents,” and was obtained from a March 12, 2024 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of 23andMe’s privacy practices last updated June 2, 2023 applicable to:

residents of California, Washington, Colorado, Virginia, Utah, and Connecticut and contains information required by the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, the Colorado Privacy Act (“CPA”), the Virginia Consumer Data Protection Act (“VCDPA”), the Utah Consumer Privacy Act (“UCPA”), the Washington My Health My Data Act (“MHMDA”), and the Connecticut Data Privacy Act (“CTDPA”) (collectively, “U.S. State Data Protection Laws”).

It summarizes and notifies users of their following rights:

- You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

26. Attached hereto as **Exhibit 25** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20230526041043/https://www.23andme.com/legal/us-privacy/> as of June 11, 2025. This webpage is titled “Privacy Notice for U.S. State Residents,” and was obtained from a May 26, 2023 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of 23andMe’s privacy practices last updated March 30, 2023 applicable to “residents of California, Colorado, and Virginia and contains information required by the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, and Virginia Consumer Data Protection Act (“VCDPA”) (collectively, “U.S. State Data Protection Laws”).”

It summarizes and notifies users of their following rights:

- You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

27. Attached hereto as **Exhibit 26** is a true and correct copy of a printout of the

webpage <https://web.archive.org/web/20230324153004/https://www.23andme.com/legal/us-privacy/> as of June 11, 2025. This webpage is titled “Privacy Notice for U.S. State Residents,” and was obtained from a March 24, 2023 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of 23andMe’s privacy practices last updated December 14, 2022 applicable to “residents of California, Colorado, and Virginia and contains information required by the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, and Virginia Consumer Data Protection Act (“VCDPA”) (collectively, “U.S. State Data Protection Laws”).” It summarizes and notifies users of their following rights:

- You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

28. Attached hereto as **Exhibit 27** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20221127182626/https://www.23andme.com/about/california-privacy/> as of June 11, 2025. This webpage is titled “Privacy Notice for California Residents,” and was obtained from a November 27, 2023 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of 23andMe’s privacy practices last updated August 2, 2022 applicable to California residents pursuant to the CCPA. It summarizes and notifies users of their following rights:

- You have the right to know whether we sell your Personal Information and opt-out of a sale if we do. But rest-assured, we do not sell your Personal Information.”
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You can request access to your Personal Information, get a copy, and delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

29. Attached hereto as **Exhibit 28** is a true and correct copy of a printout of the webpage <https://web.archive.org/web/20220812001810/https://www.23andme.com/about/california-privacy/?version=1.0> as of June 11, 2025. This webpage is titled “Privacy Notice for California Residents,” and was obtained from an August 12, 2022 capture by the Internet Archive of the contents of a webpage from 23andMe’s website. This document contains a set of 23andMe’s privacy practices last updated January 1, 2020 applicable to California residents pursuant to the CCPA. It provides key definitions under the CCPA, notifies users of their data privacy rights regarding (1) notice and access (2) deletion (3) opt-out of sales, (4) non-discrimination, and (5) designated methods for submitting rights requests and verifying consumer requests. The webpage further has a table describing the categories of personal information collected, disclosures of personal information for business and commercial purposes.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 16th day of June, 2025 in New York, New York.

By: /s/ Jami Vibbert
Jami Mills Vibbert
Jami.Vibbert@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: 212.836.7383
Facsimile: 212.836.8689

*Privacy Counsel for TTAM Research
Institute*

Exhibit 1

Privacy Statement

Last Updated: March 14, 2025

What you should know about privacy at 23andMe

At 23andMe, Privacy is in our DNA.

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc., including www.23andme.com (<https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Should you choose to receive Telehealth Services coordinated through 23andMe, with clinical services provided through licensed healthcare providers, there is a separate [Medical Record Privacy Notice](https://www.23andme.com/legal/medical_record_privacy_notice/) (https://www.23andme.com/legal/medical_record_privacy_notice/) that describes how your medical information is used, disclosed, and maintained.

To keep things simple, we use the same terms here as in our [Terms of Service](https://www.23andme.com/legal/terms_of_service/) (https://www.23andme.com/legal/terms_of_service/). We'll let you know in this Privacy Statement if we have a new or different definition for a term. You should read our entire Privacy Statement, but if you only have a few minutes you can take a look at this [summary](https://www.23andme.com/privacy/) (<https://www.23andme.com/privacy/>).

The information 23andMe collects

We try not to speak in legalese, but there are some useful definitions we use to describe data we collect in providing the Services to you.

When we say **Personal Information**, we use this as a general term to refer to the different data categories we describe in this section that either personally identify you or are about you. Your Personal Information can be either

- **Individual-level Information:** information about a single individual, such as their genotypes, diseases or other traits or characteristics.
- **De-identified Information:** information that has been stripped of identifying data, such as name and contact information, so that an individual cannot reasonably be identified.

Here are the types of Personal Information we collect:

- **Registration Information:** information you provide during account registration or when purchasing the Services, such as a name, user ID, password, date of birth, billing address, shipping address, payment information (e.g., credit card), account authentication information, or contact information (e.g., email, phone number).
- **Genetic Information:** information regarding your genotype (e.g., the As, Ts, Cs, and Gs at particular locations in your DNA). Genetic Information includes the 23andMe genetic data and reports provided to you as part of our Services.
- **Sample Information:** information regarding any sample, such as a saliva sample, that you submit for processing to be analyzed to provide you with Genetic Information, laboratory values or other data provided through our Services.
- **Self-Reported Information:** information you provide to 23andMe including your gender, disease conditions, health related information, traits, ethnicity, family history, or anything else you provide to us within our Service(s).
- **Biometric information:** certain Self Reported Information you provide to us or our service providers to verify your identity using biological characteristics.
- **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials, other than Genetic Information and Self Reported Information, generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe. For example, User Content includes comments posted on our Blog or messages you send through our Services.
- **Web-Behavior Information:** information on how you use our Services or about the way your devices use our Services is collected through log files, cookies, web beacons, and similar technologies (e.g., device information, device identifiers, IP address, browser type, location, domains, page views).

Aggregate Information is different from Personal Information

Aggregate Information is not Personal Information because Aggregate Information does not contain information about, nor can it reasonably be linked to, a specific individual. Aggregate Information is information about a group of people, such as an analysis or evaluation of a group. Aggregate Information describes the group as a whole in such a way that no specific individual may be reasonably identified. For example, the number of 23andMe customers with a specific variant or health condition is Aggregate Information.

- **You:** We collect information you provide to us when you request or purchase Services or information from us (including authorizations to share data with us from another entity, like lab test results and other medical information), register with us (including when you link your account on a third party site or platform with your 23andMe account, such as via Google or Apple), participate in forums or other activities on our sites, features, and applications, respond to surveys, visit our physical properties, call our Customer Care support line, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.
- **Service Providers:** We may collect information through service providers who use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels, and tags when you visit, use or interact with our Services. For more detail on how we collect and use Web Behavior Information, please see our [Cookie Policy \(https://www.23andme.com/about/cookies/\)](https://www.23andme.com/about/cookies/).
- **Other Third Parties:** We may receive information about you from other users, individuals, our corporate affiliates, or other third parties. For example, if someone gifts you a testing kit or Subscription, invites you to view their 23andMe Report, or otherwise refers you to 23andMe, we may collect information about you.
- **23andMe:** We may infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics. For example, we use your Genetic Information to predict certain health predispositions, or we may infer your location (such as city, state, and country) based on your IP address.

How we use your information

Now that we've covered the types of information we collect and how we collect it, let's review how we may use it. As a reminder, we will not use your Genetic Information for personalized or targeted marketing and/or advertising without your explicit consent. If you want to dig into the details of how we use your information, check out our [How We Use Your Information page \(https://www.23andme.com/legal/how_we_use_info/\)](https://www.23andme.com/legal/how_we_use_info/).

We use your information to:

- Provide our Services, including to develop, operate, improve, maintain, and safeguard our Services, including developing new product tools and features
- Analyze and measure trends and usage of the Services
- Communicate with you, including customer support, or to share information about our Services or other offers or information we think may be relevant to you
- Personalize, contextualize and market our Services to you
- Provide cross context behavioral or targeted advertising (learn more in our [Cookie Policy \(https://www.23andme.com/about/cookies/\)](https://www.23andme.com/about/cookies/) and [Cookie Choices \(https://www.23andme.com/about/cookie_choices/\)](https://www.23andme.com/about/cookie_choices/) page)
- Enhance the safety, integrity, and security of our Services, including prevention of fraud and other unauthorized or illegal activities on our Services
- Verify your identity and administer your User Account
- Enforce, investigate, and report conduct violating our Terms of Service or other policies
- Conduct surveys or polls, and obtain testimonials or stories about you
- Comply with our legal, licensing, and regulatory obligations
- Conduct [23andMe Research \(https://customercare.23andme.com/hc/en-us/sections/200565350\)](https://customercare.23andme.com/hc/en-us/sections/200565350) Research and Surveys), if you choose to participate

What 23andMe Research participation means for you

23andMe has an opt in research program, meaning that for eligible customers, taking part in 23andMe Research is completely voluntary. Refer to the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/) for information to help you make an informed choice about participating. Here are key points about 23andMe Research, how Research uses personal information, and other ways we safeguard your privacy.

Before explaining how Research uses Personal Information, let's cover a few basics:

What is 23andMe Research?

The purpose of 23andMe Research is to make new discoveries about genetics and other factors behind diseases and traits. "23andMe Research" means research activities performed by 23andMe, either independently or jointly with third parties, and overseen by an independent ethics review board (also called an Institutional Review Board or "IRB"). 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, including non profit foundations, academic institutions or pharmaceutical companies.

What if I do not want to participate in Research?

If you are eligible to participate in Research, you choose whether to participate or not, and you can change your mind any time. Customers never need to participate in Research to use 23andMe. Nothing changes about your core 23andMe experience if you do not participate in Research. We do not use your information for Research unless you explicitly choose to participate in Research.

23andMe Research analyses are conducted with information that has been stripped of your identifying Registration Information. You can read more about protections for your data in the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/).

If you choose to consent to the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/)...

- Your de-identified [Genetic Information](#) and/or [Self Reported Information](#) may be used for Research.
- We may use de-identified individual level [Genetic Information](#) and [Self Reported Information](#) internally at 23andMe for research purposes.
- We may share summaries of research results, which do not identify any particular individual, with qualified research collaborators and in scientific publications.
- We may inform you of research opportunities for which you may be eligible. We will not share individual level Personal Information without your explicit consent. To change your preferences for these communications, go to your [Account Settings \(https://you.23andme.com/user/edit/preferences/\)](https://you.23andme.com/user/edit/preferences/).

Some participants choose to contribute in additional ways to Research. For example, you can choose to participate in [Individual Level Data Sharing \(https://www.23andme.com/about/individual-data-consent/\)](https://www.23andme.com/about/individual-data-consent/), or additional study specific agreement(s). Those consents are separate and, like the Main Research Consent, you can withdraw from them anytime. You should review those specific consents for the details. Take a look at your other [Research consent documents \(https://you.23andme.com/user/edit/research/\)](https://you.23andme.com/user/edit/research/).

Data sharing

We appreciate the level of trust you put into us. Here's how we do, and do not share your information.

Who we share with:

Service providers: Our service providers and contractors help us provide our Services and act on our behalf to get things done. We implement procedures and maintain contractual terms with each service provider and contractor to protect the confidentiality and security of your Personal Information. For example, some of the things we use service providers and contractors to help us with include: order fulfillment and shipping; processing and analyzing your samples (check out the [How We Use Info page \(https://www.23andme.com/legal/how-we-use-info/\)](https://www.23andme.com/legal/how-we-use-info/) to learn more!); sample storage (as we like to call it, "biobanking"); customer care support; cloud storage, IT, and security; marketing and analytics; and more. Learn more about cookies, analytics, and advertising partners we use on our Services in our [Cookie Policy \(https://www.23andme.com/about/cookies/\)](https://www.23andme.com/about/cookies/).

Your sharing choices: You may direct us to share your Personal Information with friends, family members, doctors or other healthcare professionals, and/or any other individuals or entities who may or may not be using our Services, including through third party services such as social networks and third-party apps that connect to our Services. If you share your Personal Information with a third party, they may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved.

Commonly owned entities, affiliates and change of ownership: If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services.

Third parties related to law, harm, and the public interest: We can't say it enough – 23andMe will not provide information to law enforcement unless required by law to comply with a valid court order, subpoena, or search warrant. We require all law enforcement inquiries to follow a valid legal process, such as a court order or search warrant, and are prepared to exhaust available legal remedies to protect customer privacy. If we are compelled to disclose your Personal Information to law enforcement, we will try our best to provide you with prior notice, unless we are prohibited from doing so under the law.

23andMe will preserve and disclose any and all information if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe [Terms of Service \(https://www.23andme.com/legal/terms-of-service/\)](https://www.23andme.com/legal/terms-of-service/) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, officers, directors, contractors or other personnel, its users, and the public. Nothing in this Privacy Statement is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Personal Information.

Who we **DO NOT** share with:

You can rest assured, *we will not* voluntarily share your Personal Information with:

- Public databases
- Insurance companies or employers
- Law enforcement, absent a valid court order, subpoena, or search warrant (Check out our track record on this promise in our [Transparency Report \(https://www.23andme.com/transparency-report/\)](https://www.23andme.com/transparency-report/))

It's your data, and we make it easy to make decisions and certain choices about it. We do not make choices on your behalf for the privacy settings described below. Below are the types of controls you have in your Account Settings and we've listed what it means to opt-out or to opt-in:

Storing your sample

- Opt-out: No, I do not want my sample stored. If you choose to discard your sample, it will be securely destroyed after the lab completes its analysis, subject to laboratory legal and regulatory requirements. Note, a discard choice cannot be reversed.
- Opt-in: Yes, I want my sample stored. Learn more about [Biobanking \(https://www.23andme.com/about/biobanking/\)](https://www.23andme.com/about/biobanking/).

Viewing your health reports

- Opt-out: No, I do not want to receive my health reports.
- Opt-in: Yes, I do want to receive Genetic Health Risk and Carrier Status reports, as well as other reports (e.g., Pharmacogenetics reports) if available.

Sharing features

- Opt-out: No, I do not want to share my information with genetic relatives or other users via features like DNA Relatives or My Connections.
- Opt-in: Yes, I want to be able to share my information so I can discover genetic relatives or connect with others.

Personalized recommendations

- Opt-out: No, I do not want to receive Personalized Recommendations based on my sensitive data categories.
- Opt-in: Yes, I want to receive Personalized Recommendations to receive custom health and wellness recommendations, offers, and other information based on my sensitive data categories. Learn more about [Personalized Recommendations \(https://customercare.23andme.com/hc/en-us/articles/9295505340183\)](https://customercare.23andme.com/hc/en-us/articles/9295505340183).

Communications preferences

- Opt-out: Please don't contact me for promotional purposes. In addition to changing your preferences via Account Settings or your device, you can also click the "unsubscribe" button at the bottom of promotional email communications.
- Opt-in: Yes, you can contact me (such as through email, in-product notifications, or push notifications) for product or promotional purposes.

Research participation

- Opt-out: I don't want to participate in 23andMe Research. If you experience difficulties changing your consent status in Account Settings, contact the Human Protections Administrator at hpa@23andme.com. You can change your mind any time about your participation, however any Research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn.
- Opt-in: Yes, I'd like to participate in 23andMe Research. Learn more about [Research \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/).

You can also:

Access & Download: You can access and download your Personal Information processed by 23andMe. Please note, if you lose access to your 23andMe Account, we require that you submit additional information to verify your identity before providing access or otherwise releasing information to you.

Correct Information: You can correct your Registration Information and modify Self-Reported Information entered into surveys.

Delete your Account: You can delete your 23andMe account within your Account Settings at any time. Upon account deletion, we will automatically opt you out of Research and discard your sample.

Keep in mind this process cannot be canceled, undone, withdrawn, or reversed, and your account deletion is subject to retention requirements and certain exceptions. For exact instructions, please read our [Customer Care guidance \(https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure\)](https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure).

Other things to know about privacy

Security Measures

We implement physical, technical, and administrative measures aimed at preventing unauthorized access to or disclosure of your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your Personal Information. To learn more about our practices, please visit our [Customer Care guidance \(https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected\)](https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected).

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Please recognize that protecting your Personal Information is also your responsibility. Be mindful of keeping your password and other authentication information safe from third parties, and immediately notify 23andMe of any unauthorized use of your login credentials. Your password is not visible to 23andMe staff, and we encourage you not to share your password with 23andMe or any third parties. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Third Party Content and Integrations

Our Services may contain third party content, integrations or links to third party websites operated by organizations not affiliated with 23andMe. Through these integrations, you may be providing information to the third party as well as to 23andMe. Since we can only control our own Services, we are not responsible for how those third parties collect or use your information so please review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our Services.

Federal, State, and Region-Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, residents of California and other states (<https://www.23andme.com/about/california-privacy/>) have specific privacy rights, as well as 23andMe residents of the European Economic Area (EEA), the UK, Switzerland and other jurisdictions (<https://www.23andme.com/legal/eu-privacy-notice/>).

Federal and state laws (including the federal Genetic Information Non-discrimination Act or "GINA") provide some protection from employer and health insurance discrimination based on your genetics. Learn more (<https://customercare.23andme.com/hc/en-us/articles/202907820-What-Is-GINA->).

Retention of Personal Information

We retain Personal Information for as long as necessary to provide the Services and fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.


23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements, even if you chose to delete your account. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. We'll let you know about those changes here or by reaching out to you via email or some other contact method, such as through in-app notification, or on another website page or feature.

Contact Information

If you have questions about this Privacy Statement, or have a complaint or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<mailto:privacy@23andme.com>), call us at 1.800.239.5230, or send a letter to:

Privacy Administrator
23andMe, Inc.
870 Market Street, Room 415
San Francisco, CA 94102
 23andMe ^{LLC}

[Shop \(/compare-dna-tests/\)](#)

[Read the previous version of the document. \(/legal/privacy/full-version/7.3/\)](#)



SERVICES

[Health + Ancestry \(/dna-health-ancestry/\)](#)

[Ancestry Service \(/dna-ancestry/\)](#)

[23andMe+ Premium \(/membership/\)](#)

[23andMe+ Total Health \(/total-health/\)](#)

LEGAL

[Important Test Info \(/test-info/\)](#)

[Terms of Service \(/legal/terms-of-service/\)](#)

[Privacy Statement \(/legal/privacy/\)](#)

[Data Protection \(/gdpr/\)](#)

[Gifts \(/gifts/\)](#)

[Merchandise \(https://merch.23andme.com/\)](#)

COMPANY

[Investors \(https://investors.23andme.com/\)](#)

[About Us \(/about/\)](#)

[Stories \(/stories/\)](#)

[Surname Discovery \(https://discover.23andme.com/\)](#)

[Diversity, Equity & Inclusion \(/diversity-equity-inclusion/\)](#)

[Media Center \(https://mediacenter.23andme.com/\)](#)

[Blog \(https://blog.23andme.com/\)](#)

[Genetics Learning Hub \(/topics/\)](#)

[Careers \(/careers/\)](#)

[Refer a Friend \(https://refer.23andme.com/pub_footer_us\)](#)

[Return & Refund Policy \(https://customercare.23andme.com/hc/en-us/articles/202907780\)](#)

[Customer Care \(https://customercare.23andme.com/hc/en-us/\)](#)

[FSA/HSA Eligibility \(/fsa-hsa/\)](#)

[Site Map \(/sitemap/\)](#)

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https://play.google.com/store/apps/details?id=com.twentythreeandme.app&hl=en_US



[United States | Change](#)



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<https://www.instagram.com/23andMe>



<https://twitter.com/23andMe/>



<https://www.linkedin.com/company/23andme>

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Family Considerations (https://customercare.23andme.com/hc/en-us/articles/202907980)

[Research Consent \(/about/consent/\)](#)

[Individual Data Consent \(/about/individual-data-consent/\)](#)

[Biobanking Consent \(/about/biobanking/\)](#)

[Cookie Policy \(/about/cookies/\)](#)

[Cookie Choices \(/about/cookie-choices/\)](#)

[Patent Information \(/patents/\)](#)

[Report a Security Issue \(/security-report/\)](#)

[Consumer Health Data Privacy Policy \(/legal/us-privacy/#washington-consumer-health-data-privacy-policy\)](#)

PARTNER WITH US

[Healthcare Professionals \(https://medical.23andme.com/\)](#)

[Scientists \(https://research.23andme.com/\)](#)

[Business Development \(https://partner.23andme.com/\)](#)

Exhibit 2

Privacy Statement

Last Updated: September 24, 2024

What you should know about privacy at 23andMe

At 23andMe, Privacy is in our DNA.

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc., including www.23andme.com (<https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Should you choose to receive Telehealth Services coordinated through 23andMe, with clinical services provided through licensed healthcare providers, there is a separate [Medical Record Privacy Notice](https://www.23andme.com/legal/medical-record-privacy-notice/) (<https://www.23andme.com/legal/medical-record-privacy-notice/>) that describes how your medical information is used, disclosed, and maintained.

To keep things simple, we use the same terms here as in our [Terms of Service](https://www.23andme.com/legal/terms-of-service/) (<https://www.23andme.com/legal/terms-of-service/>). We'll let you know in this Privacy Statement if we have a new or different definition for a term. You should read our entire Privacy Statement, but if you only have a few minutes you can take a look at this [summary](https://www.23andme.com/privacy/) (<https://www.23andme.com/privacy/>).

The information 23andMe collects

We try not to speak in legalese, but there are some useful definitions we use to describe data we collect in providing the Services to you.

When we say **Personal Information**, we use this as a general term to refer to the different data categories we describe in this section that either personally identify you or are about you. Your Personal Information can be either

- **Individual-level Information:** information about a single individual, such as their genotypes, diseases or other traits or characteristics.
- **De-identified Information:** information that has been stripped of identifying data, such as name and contact information, so that an individual cannot reasonably be identified.

Here are the types of Personal Information we collect:

- **Registration Information:** information you provide during account registration or when purchasing the Services, such as a name, user ID, password, date of birth, billing address, shipping address, payment information (e.g., credit card), account authentication information, or contact information (e.g., email, phone number).
- **Genetic Information:** information regarding your genotype (e.g., the As, Ts, Cs, and Gs at particular locations in your DNA). Genetic Information includes the 23andMe genetic data and reports provided to you as part of our Services.
- **Sample Information:** information regarding any sample, such as a saliva sample, that you submit for processing to be analyzed to provide you with Genetic Information, laboratory values or other data provided through our Services.
- **Self-Reported Information:** information you provide to 23andMe including your gender, disease conditions, health-related information, traits, ethnicity, family history, or anything else you provide to us within our Service(s).
- **Biometric information:** certain Self-Reported Information you provide to us or our service providers to verify your identity using biological characteristics.
- **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials, other than Genetic Information and Self-Reported Information, generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe. For example, User Content includes comments posted on our Blog or messages you send through our Services.
- **Web-Behavior Information:** information on how you use our Services or about the way your devices use our Services is collected through log files, cookies, web beacons, and similar technologies (e.g., device information, device identifiers, IP address, browser type, location, domains, page views).

Aggregate Information is different from Personal Information

Aggregate Information is not Personal Information because Aggregate Information does not contain information about, nor can it reasonably be linked to, a specific individual. Aggregate Information is information about a group of people, such as an analysis or evaluation of a group. Aggregate Information describes the group as a whole in such a way that no specific individual may be reasonably identified. For example, the number of 23andMe customers with a specific variant or health condition is Aggregate Information.

How we collect information

- **You:** We collect information you provide to us when you request or purchase Services or information from us (including authorizations to share data with us from another entity, like lab test results and other medical information), register with us (including when you link your account on a third-party site or platform with your 23andMe account, such as via Google or Apple), participate in forums or other activities on our sites, features, and applications, respond to surveys, visit our physical properties, call our Customer Care support line, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.
- **Service Providers:** We may collect information through service providers who use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels, and tags when you visit, use or interact with our Services. For more detail on how we collect and use Web-Behavior Information, please see our [Cookie Policy](https://www.23andme.com/about/cookies/) (<https://www.23andme.com/about/cookies/>).
- **Other Third Parties:** We may receive information about you from other users, individuals, our corporate affiliates, or other third parties. For example, if someone gifts you a testing kit or Subscription, invites you to view their 23andMe Report, or otherwise refers you to 23andMe, we may collect information about you.
- **23andMe:** We may infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics. For example, we use your Genetic Information to predict certain health predispositions, or we may infer your location (such as city, state, and country) based on your IP address.

Now that we've covered the types of information we collect and how we collect it, let's review how we may use it. As a reminder, we will not use your Genetic Information for personalized or targeted marketing and/or advertising without your explicit consent. If you want to dig into the details of how we use your information, check out our [How We Use Your Information page \(https://www.23andme.com/legal/how-we-use-info/\)](https://www.23andme.com/legal/how-we-use-info/).

We use your information to:

- Provide our Services, including to develop, operate, improve, maintain, and safeguard our Services, including developing new product tools and features
- Analyze and measure trends and usage of the Services
- Communicate with you, including customer support, or to share information about our Services or other offers or information we think may be relevant to you
- Personalize, contextualize and market our Services to you
- Provide cross-context behavioral or targeted advertising (learn more in our [Cookie Policy \(https://www.23andme.com/about/cookies/\)](https://www.23andme.com/about/cookies/) and [Cookie Choices \(https://www.23andme.com/about/cookie-choices/\)](https://www.23andme.com/about/cookie-choices/) page)
- Enhance the safety, integrity, and security of our Services, including prevention of fraud and other unauthorized or illegal activities on our Services
- Verify your identity and administer your User Account
- Enforce, investigate, and report conduct violating our Terms of Service or other policies
- Conduct surveys or polls, and obtain testimonials or stories about you
- Comply with our legal, licensing, and regulatory obligations
- Conduct [23andMe Research \(https://customercare.23andme.com/hc/en-us/sections/200565350-Research-and-Surveys\)](https://customercare.23andme.com/hc/en-us/sections/200565350-Research-and-Surveys), if you choose to participate

What 23andMe Research participation means for you

23andMe has an opt-in research program, meaning that for eligible customers, taking part in 23andMe Research is completely voluntary. Refer to the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/) for information to help you make an informed choice about participating. Here are key points about 23andMe Research, how Research uses personal information, and other ways we safeguard your privacy.

Before explaining how Research uses Personal Information, let's cover a few basics:

What is 23andMe Research?

The purpose of 23andMe Research is to make new discoveries about genetics and other factors behind diseases and traits. “23andMe Research” means research activities performed by 23andMe, either independently or jointly with third parties, and overseen by an independent ethics review board (also called an Institutional Review Board or “IRB”). 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, including non-profit foundations, academic institutions or pharmaceutical companies.

What if I do not want to participate in Research?

If you are eligible to participate in Research, you choose whether to participate or not, and you can change your mind any time. Customers never need to participate in Research to use 23andMe. Nothing changes about your core 23andMe experience if you do not participate in Research. We do not use your information for Research unless you explicitly choose to participate in Research.

How does 23andMe protect my information in Research?

23andMe Research analyses are conducted with information that has been stripped of your identifying Registration Information. You can read more about protections for your data in the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/).

If you choose to consent to the [Main Research Consent \(https://www.23andme.com/about/consent/\)](https://www.23andme.com/about/consent/)...

- Your de-identified [Genetic Information](#) and/or [Self-Reported Information](#) may be used for Research.
- We may use de-identified individual-level [Genetic Information](#) and [Self-Reported Information](#) internally at 23andMe for research purposes.
- We may share summaries of research results, which do not identify any particular individual, with qualified research collaborators and in scientific publications.
- We may inform you of research opportunities for which you may be eligible. We will not share individual-level Personal Information without your explicit consent. To change your preferences for these communications, go to your [Account Settings \(https://you.23andme.com/user/edit/preferences/\)](https://you.23andme.com/user/edit/preferences/).

Some participants choose to contribute in additional ways to Research. For example, you can choose to participate in [Individual Level Data Sharing \(https://www.23andme.com/about/individual-data-consent/\)](https://www.23andme.com/about/individual-data-consent/), or additional study-specific agreement(s). Those consents are separate and, like the Main Research Consent, you can withdraw from them anytime. You should review those specific consents for the details. Take a look at your other [Research consent documents \(https://you.23andme.com/user/edit/research/\)](https://you.23andme.com/user/edit/research/).

Data sharing

We appreciate the level of trust you put into us. Here's how we do, and do not share your information.

Who we share with:

Service providers: Our service providers and contractors help us provide our Services and act on our behalf to get things done. We implement procedures and maintain contractual terms with each service provider and contractor to protect the confidentiality and security of your Personal Information. For example, some of the things we use service providers and contractors to help us with include: order fulfillment and shipping; processing and analyzing your samples (check out the [How We Use Info page \(https://www.23andme.com/legal/how-we-use-info/\)](https://www.23andme.com/legal/how-we-use-info/) to learn more!); sample storage (as we like to call it, “biobanking”); customer care support; cloud storage, IT, and security; marketing and analytics; and more. Learn more about cookies, analytics, and advertising partners we use on our Services in our [Cookie Policy \(https://www.23andme.com/about/cookies/\)](https://www.23andme.com/about/cookies/).

Your sharing choices: You may direct us to share your Personal Information with friends, family members, doctors or other healthcare professionals, and/or any other individuals or entities who may or may not be using our Services, including through third party services such as social networks and third-party apps that connect to our Services. If you share your Personal Information with a third party, they may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved.

Commonly owned entities, affiliates and change of ownership: If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services.

Third parties related to law, harm, and the public interest: We can't say it enough – 23andMe will not provide information to law enforcement unless required by law to comply with a valid court order, subpoena, or search warrant. We require all law enforcement inquiries to follow a valid legal process, such as a court order or search warrant, and are prepared to exhaust available legal remedies to protect customer privacy. If we are compelled to disclose your Personal Information to law enforcement, we will try our best to provide you with prior notice, unless we are prohibited from doing so under the law.

23andMe will preserve and disclose any and all information if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe [Terms of Service](https://www.23andme.com/legal/terms-of-service/) (<https://www.23andme.com/legal/terms-of-service/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, officers, directors, contractors or other personnel, its users, and the public. Nothing in this Privacy Statement is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Personal Information.

Who we *DO NOT* share with:

You can rest assured, *we will not* voluntarily share your Personal Information with:

- Public databases
- Insurance companies or employers
- Law enforcement, absent a valid court order, subpoena, or search warrant (Check out our track record on this promise in our [Transparency Report](https://www.23andme.com/transparency-report/) (<https://www.23andme.com/transparency-report/>))

Your privacy settings and controls

It's your data, and we make it easy to make decisions and certain choices about it. We do not make choices on your behalf for the privacy settings described below. Below are the types of controls you have in your Account Settings and we've listed what it means to opt-out or to opt-in:

Storing your sample

- Opt-out: No, I do not want my sample stored. If you choose to discard your sample, it will be securely destroyed after the lab completes its analysis, subject to laboratory legal and regulatory requirements. Note, a discard choice cannot be reversed.
- Opt-in: Yes, I want my sample stored. Learn more about [Biobanking](https://www.23andme.com/about/biobanking/) (<https://www.23andme.com/about/biobanking/>).

Viewing your health reports

- Opt-out: No, I do not want to receive my health reports.
- Opt-in: Yes, I do want to receive Genetic Health Risk and Carrier Status reports, as well as other reports (e.g., Pharmacogenetics reports) if available.

Sharing features

- Opt-out: No, I do not want to share my information with genetic relatives or other users via features like DNA Relatives or My Connections.
- Opt-in: Yes, I want to be able to share my information so I can discover genetic relatives or connect with others.

Personalized recommendations

- Opt-out: No, I do not want to receive Personalized Recommendations based on my sensitive data categories.
- Opt-in: Yes, I want to receive Personalized Recommendations to receive custom health and wellness recommendations, offers, and other information based on my sensitive data categories. Learn more about [Personalized Recommendations](https://customercare.23andme.com/hc/en-us/articles/9295505340183) (<https://customercare.23andme.com/hc/en-us/articles/9295505340183>).

Communications preferences

- Opt-out: Please don't contact me for promotional purposes. In addition to changing your preferences via Account Settings or your device, you can also click the "unsubscribe" button at the bottom of promotional email communications.
- Opt-in: Yes, you can contact me (such as through email, in-product notifications, or push notifications) for product or promotional purposes.

Research participation

- Opt-out: I don't want to participate in 23andMe Research. If you experience difficulties changing your consent status in Account Settings, contact the Human Protections Administrator at hpa@23andMe.com. You can change your mind any time about your participation, however any Research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn.
- Opt-in: Yes, I'd like to participate in 23andMe Research. Learn more about [Research](https://www.23andme.com/about/consent/) (<https://www.23andme.com/about/consent/>).

You can also:

Access & Download: You can access and download your Personal Information processed by 23andMe. Please note, if you lose access to your 23andMe Account, we require that you submit additional information to verify your identity before providing access or otherwise releasing information to you.

Correct Information: You can correct your Registration Information and modify Self-Reported Information entered into surveys.

Delete your Account: You can delete your 23andMe account within your Account Settings at any time. Upon account deletion, we will automatically opt you out of Research and discard your sample.

Keep in mind this process cannot be canceled, undone, withdrawn, or reversed, and your account deletion is subject to retention requirements and certain exceptions. For exact instructions, please read our [Customer Care guidance](https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure) (<https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure>).

Security Measures

We implement physical, technical, and administrative measures aimed at preventing unauthorized access to or disclosure of your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your Personal Information. To learn more about our practices, please visit our [Customer Care guidance \(https://customer care.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected\)](https://customer care.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected).

Please recognize that protecting your Personal Information is also your responsibility. Be mindful of keeping your password and other authentication information safe from third parties, and immediately notify 23andMe of any unauthorized use of your login credentials. Your password is not visible to 23andMe staff, and we encourage you not to share your password with 23andMe or any third parties. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Third Party Content and Integrations

Our Services may contain third party content, integrations or links to third party websites operated by organizations not affiliated with 23andMe. Through these integrations, you may be providing information to the third party as well as to 23andMe. Since we can only control our own Services, we are not responsible for how those third parties collect or use your information so please review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our Services.

Federal, State, and Region-Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, [residents of California and other states \(https://www.23andme.com/about/california-privacy/\)](https://www.23andme.com/about/california-privacy/) have specific privacy rights, as well as 23andMe [residents of the European Economic Area \(EEA\), the UK, Switzerland and other jurisdictions \(https://www.23andme.com/legal/eu-privacy-notice/\)](https://www.23andme.com/legal/eu-privacy-notice/).

Federal and state laws (including the federal Genetic Information Non-discrimination Act or “GINA”) provide some protection from employer and health insurance discrimination based on your genetics. [Learn more \(https://customer care.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-\)](https://customer care.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-).

Retention of Personal Information

We retain Personal Information for as long as necessary to provide the Services and fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements, even if you chose to delete your account. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. We'll let you know about those changes here or by reaching out to you via email or some other contact method, such as through in-app notification, or on another website page or feature.

Contact Information

If you have questions about this Privacy Statement, or have a complaint or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<mailto:privacy@23andme.com>), call us at 1.800.239.5230, or send a letter to:

Privacy Administrator
23andMe, Inc.
223 N. Mathilda Ave.
Sunnyvale, CA 94086



SERVICES

- [Health + Ancestry \(/dna-health-ancestry/\)](#)
- [Ancestry Service \(/dna-ancestry/\)](#)
- [23andMe+ Premium \(/membership/\)](#)
- [23andMe+ Total Health \(/total-health/\)](#)
- [Gifts \(/gifts/\)](#)
- [Merchandise \(https://merch.23andme.com/\)](https://merch.23andme.com/)


COMPANY


- [Investors \(https://investors.23andme.com/\)](https://investors.23andme.com/)
- [About Us \(/about/\)](#)
- [Stories \(/stories/\)](#)
- [Surname Discovery \(https://discover.23andme.com/\)](https://discover.23andme.com/)
- [Diversity, Equity & Inclusion \(/diversity-equity-inclusion/\)](#)

LEGAL

- [Important Test Info \(/test-info/\)](#)
- [Terms of Service \(/legal/terms-of-service/\)](#)
- [Privacy Statement \(/legal/privacy/\)](#)
- [Data Protection \(/gdpr/\)](#)
- [Family Considerations \(https://customer care.23andme.com/hc/en-us/articles/202907980\)](https://customer care.23andme.com/hc/en-us/articles/202907980)
- [Research Consent \(/about/consent/\)](#)
- [Individual Data Consent \(/about/individual-data-consent/\)](#)
- [Biobanking Consent \(/about/biobanking/\)](#)
- [Cookie Policy \(/about/cookies/\)](#)
- [Cookie Choices \(/about/cookie-choices/\)](#)
- [Patent Information \(/patents/\)](#)
- [Report a Security Issue \(/security-report/\)](#)

DOWNLOAD APP

<https://itunes.apple.com/us/app/23andme/id952516687?ls=1&mt=8>

https://play.google.com/store/apps/details?id=com.twentythreeandme.app&hl=en_US


 [United States](#) | [Change](#)

Exhibit 3

Privacy Statement

Last Updated: October 4, 2023

What you should know about privacy at 23andMe

At 23andMe, Privacy is in our DNA.

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc., including www.23andme.com (<https://web.archive.org/web/20240920194451/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Should you choose to receive Telehealth Services coordinated through 23andMe, with clinical services provided through licensed healthcare providers, there is a separate [Medical Record Privacy Notice](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/medical_record_privacy_notice/) (https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/medical_record_privacy_notice/) that describes how your medical information is used, disclosed, and maintained.

To keep things simple, we use the same terms here as in our [Terms of Service](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/terms_of_service/) (https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/terms_of_service/). We'll let you know in this Privacy Statement if we have a new or different definition for a term. You should read our entire Privacy Statement, but if you only have a few minutes you can take a look at this [summary](https://web.archive.org/web/20240920194451/https://www.23andme.com/privacy/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/privacy/>).

The information 23andMe collects

We try not to speak in legalese, but there are some useful definitions we use to describe data we collect in providing the Services to you.

When we say **Personal Information**, we use this as a general term to refer to the different data categories we describe in this section that either personally identify you or are about you. Your Personal Information can be either

- **Individual-level Information:** information about a single individual, such as their genotypes, diseases or other traits or characteristics.
- **De-identified Information:** information that has been stripped of identifying data, such as name and contact information, so that an individual cannot reasonably be identified.

Here are the types of Personal Information we collect:

- **Registration Information:** information you provide during account registration or when purchasing the Services, such as a name, user ID, password, date of birth, billing address, shipping address, payment information (e.g., credit card), account authentication information, or contact information (e.g., email, phone number).
- **Genetic Information:** information regarding your genotype (e.g., the As, Ts, Cs, and Gs at particular locations in your DNA). Genetic Information includes the 23andMe genetic data and reports provided to you as part of our Services.
- **Sample Information:** information regarding any sample, such as a saliva sample, that you submit for processing to be analyzed to provide you with Genetic Information, laboratory values or other data provided through our Services.
- **Self-Reported Information:** information you provide to 23andMe including your gender, disease conditions, health related information, traits, ethnicity, family history, or anything else you provide to us within our Service(s).
- **Biometric information:** certain Self Reported Information you provide to us or our service providers to verify your identity using biological characteristics.
- **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials, other than Genetic Information and Self Reported Information, generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe. For example, User Content includes comments posted on our Blog or messages you send through our Services.
- **Web-Behavior Information:** information on how you use our Services or about the way your devices use our Services is collected through log files, cookies, web beacons, and similar technologies (e.g., device information, device identifiers, IP address, browser type, location, domains, page views).

Aggregate Information is different from Personal Information

Aggregate Information is not Personal Information because Aggregate Information does not contain information about, nor can it reasonably be linked to, a specific individual. Aggregate Information is information about a group of people, such as an analysis or evaluation of a group. Aggregate Information describes the group as a whole in such a way that no specific individual may be reasonably identified. For example, the number of 23andMe customers with a specific variant or health condition is Aggregate Information.

How we collect information

- **You:** We collect information you provide to us when you request or purchase Services or information from us (including authorizations to share data with us from another entity, like lab test results and other medical information), register with us (including when you link your account on a third party site or platform with your 23andMe account, such as via Google or Apple), participate in forums or other activities on our sites, features, and applications, respond to surveys, visit our physical properties, call our Customer Care support line, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.
- **Service Providers:** We may collect information through service providers who use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels, and tags when you visit, use or interact with our Services. For more detail on how we collect and use Web Behavior Information, please see our [Cookie Policy](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/>).
- **Other Third Parties:** We may receive information about you from other users, individuals, our corporate affiliates, or other third parties. For example, if someone gifts you a testing kit or Subscription, invites you to view their 23andMe Report, or otherwise refers you to 23andMe, we may collect information about you.
- **23andMe:** We may infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics. For example, we use your Genetic Information to predict certain health predispositions, or we may infer your location (such as city, state, and country) based on your IP address.

How we use your information

Now that we've covered the types of information we collect and how we collect it, let's review how we may use it. As a reminder, we will not use your Genetic Information for personalized or targeted marketing and/or advertising without your explicit consent. If you want to dig into the details of how we use your information, check out our [How We Use Your Information page](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/how_we_use_info/) (https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/how_we_use_info/).

We use your information to:

- Provide our Services, including to develop, operate, improve, maintain, and safeguard our Services, including developing new product tools and features
- Analyze and measure trends and usage of the Services
- Communicate with you, including customer support, or to share information about our Services or other offers or information we think may be relevant to you
- Personalize, contextualize and market our Services to you
- Provide cross context behavioral or targeted advertising (learn more in our [Cookie Policy](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/>) and [Cookie Choices](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookie_choices/) (https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookie_choices/) page)
- Enhance the safety, integrity, and security of our Services, including prevention of fraud and other unauthorized or illegal activities on our Services
- Verify your identity and administer your User Account
- Enforce, investigate, and report conduct violating our Terms of Service or other policies
- Conduct surveys or polls, and obtain testimonials or stories about you
- Comply with our legal, licensing, and regulatory obligations
- Conduct [23andMe Research](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en_us/sections/200565350) (https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en_us/sections/200565350 [Research and Surveys](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en_us/sections/200565350)), if you choose to participate

What 23andMe Research participation means for you

23andMe has an opt in research program, meaning that for eligible customers, taking part in 23andMe Research is completely voluntary. Refer to the [Main Research Consent](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/>) for information to help you make an informed choice about participating. Here are key points about 23andMe Research, how Research uses personal information, and other ways we safeguard your privacy.

Before explaining how Research uses Personal Information, let's cover a few basics:

What is 23andMe Research?

The purpose of 23andMe Research is to make new discoveries about genetics and other factors behind diseases and traits. "23andMe Research" means research activities performed by 23andMe, either independently or jointly with third parties, and overseen by an independent ethics review board (also called an Institutional Review Board or "IRB"). 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, including non profit foundations, academic institutions or pharmaceutical companies.

If you are eligible to participate in Research, you choose whether to participate or not, and you can change your mind any time. Customers never need to participate in Research to use 23andMe. Nothing changes about your core 23andMe experience if you do not participate in Research. We do not use your information for Research unless you explicitly choose to participate in Research.

How does 23andMe protect my information in Research?

23andMe Research analyses are conducted with information that has been stripped of your identifying Registration Information. You can read more about protections for your data in the [Main Research Consent \(https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/).

If you choose to consent to the Main Research Consent

[\(https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/)...

- Your de identified [Genetic Information](#) and/or [Self Reported Information](#) may be used for Research.
- We may use de identified individual level [Genetic Information](#) and [Self Reported Information](#) internally at 23andMe for research purposes.
- We may share summaries of research results, which do not identify any particular individual, with qualified research collaborators and in scientific publications.
- We may inform you of research opportunities for which you may be eligible. We will not share individual-level Personal Information without your explicit consent. To change your preferences for these communications, go to your [Account Settings](#) [\(https://web.archive.org/web/20240920194451/https://you.23andme.com/user/edit/preferences/\)](https://web.archive.org/web/20240920194451/https://you.23andme.com/user/edit/preferences/).

Some participants choose to contribute in additional ways to Research. For example, you can choose to participate in [Individual Level Data Sharing](#) [\(https://web.archive.org/web/20240920194451/https://www.23andme.com/about/individual-data-consent/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/individual-data-consent/), or additional study-specific agreement(s). Those consents are separate and, like the Main Research Consent, you can withdraw from them anytime. You should review those specific consents for the details. Take a look at your other [Research consent documents](#) [\(https://web.archive.org/web/20240920194451/https://you.23andme.com/user/edit/research/\)](https://web.archive.org/web/20240920194451/https://you.23andme.com/user/edit/research/).

Data sharing

We appreciate the level of trust you put into us. Here's how we do, and do not share your information.

Who we share with:

Service providers: Our service providers and contractors help us provide our Services and act on our behalf to get things done. We implement procedures and maintain contractual terms with each service provider and contractor to protect the confidentiality and security of your Personal Information. For example, some of the things we use service providers and contractors to help us with include: order fulfillment and shipping; processing and analyzing your samples (check out the [How We Use Info](#) page [\(https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/how-we-use-info/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/how-we-use-info/) to learn more!); sample storage (as we like to call it, “biobanking”); customer care support; cloud storage, IT, and security; marketing and analytics; and more. Learn more about cookies, analytics, and advertising partners we use on our Services in our [Cookie Policy](#) [\(https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/).

Your sharing choices: You may direct us to share your Personal Information with friends, family members, doctors or other healthcare professionals, and/or any other individuals or entities who may or may not be using our Services, including through third party services such as social networks and third-party apps that connect to our Services. If you share your Personal Information with a third party, they may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved.

Commonly owned entities, affiliates and change of ownership: If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services.

Third parties related to law, harm, and the public interest: We can't say it enough – 23andMe will not provide information to law enforcement unless required by law to comply with a valid court order, subpoena, or search warrant. We require all law enforcement inquiries to follow a valid legal process, such as a court order or search warrant, and are prepared to exhaust available legal remedies to protect customer privacy. If we are compelled to disclose your Personal Information to law enforcement, we will try our best to provide you with prior notice, unless we are prohibited from doing so under the law.

23andMe will preserve and disclose any and all information if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe [Terms of Service](#) [\(https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/terms-of-service/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/terms-of-service/) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, officers, directors, contractors or other personnel, its users, and the public. Nothing in this Privacy Statement is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Personal Information.

You can rest assured, we *will not* voluntarily share your Personal Information with:

- Public databases
- Insurance companies or employers
- Law enforcement, absent a valid court order, subpoena, or search warrant (Check out our track record on this promise in our [Transparency Report](https://web.archive.org/web/20240920194451/https://www.23andme.com/transparency-report/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/transparency-report/>))

Your privacy settings and controls

It's your data, and we make it easy to make decisions and certain choices about it. We do not make choices on your behalf for the privacy settings described below. Below are the types of controls you have in your Account Settings and we've listed what it means to opt-out or to opt-in:

Storing your sample

- Opt-out: No, I do not want my sample stored. If you choose to discard your sample, it will be securely destroyed after the lab completes its analysis, subject to laboratory legal and regulatory requirements. Note, a discard choice cannot be reversed.
- Opt-in: Yes, I want my sample stored. Learn more about [Biobanking](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/biobanking/>).

Viewing your health reports

- Opt-out: No, I do not want to receive my health reports.
- Opt-in: Yes, I do want to receive Genetic Health Risk and Carrier Status reports, as well as other reports (e.g., Pharmacogenetics reports) if available.

Sharing features

- Opt-out: No, I do not want to share my information with genetic relatives or other users via features like DNA Relatives or My Connections.
- Opt-in: Yes, I want to be able to share my information so I can discover genetic relatives or connect with others.

Personalized recommendations

- Opt-out: No, I do not want to receive Personalized Recommendations based on my sensitive data categories.
- Opt-in: Yes, I want to receive Personalized Recommendations to receive custom health and wellness recommendations, offers, and other information based on my sensitive data categories. Learn more about [Personalized Recommendations](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/9295505340183) (<https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/9295505340183>).

Communications preferences

- Opt-out: Please don't contact me for promotional purposes. In addition to changing your preferences via Account Settings or your device, you can also click the "unsubscribe" button at the bottom of promotional email communications.
- Opt-in: Yes, you can contact me (such as through email, in-product notifications, or push notifications) for product or promotional purposes.

Research participation

- Opt-out: I don't want to participate in 23andMe Research. If you experience difficulties changing your consent status in Account Settings, contact the Human Protections Administrator at hpa@23andme.com. You can change your mind any time about your participation, however any Research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn.
- Opt-in: Yes, I'd like to participate in 23andMe Research. Learn more about [Research](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/>).

You can also:

Access & Download: You can access and download your Personal Information processed by 23andMe. Please note, if you lose access to your 23andMe Account, we require that you submit additional information to verify your identity before providing access or otherwise releasing information to you.

Correct Information: You can correct your Registration Information and modify Self-Reported Information entered into surveys.

Delete your Account: You can delete your 23andMe account within your Account Settings at any time. Upon account deletion, we will automatically opt you out of Research and discard your sample.

Keep in mind this process cannot be canceled, undone, withdrawn, or reversed, and your account deletion is subject to retention requirements and certain exceptions. For exact instructions, please read our [Customer Care guidance](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure) (<https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure>).

Security Measures

We implement physical, technical, and administrative measures aimed at preventing unauthorized access to or disclosure of your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your Personal Information. To learn more about our practices, please visit our [Customer Care guidance \(https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected\)](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected).

Please recognize that protecting your Personal Information is also your responsibility. Be mindful of keeping your password and other authentication information safe from third parties, and immediately notify 23andMe of any unauthorized use of your login credentials. Your password is not visible to 23andMe staff, and we encourage you not to share your password with 23andMe or any third parties. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Third Party Content and Integrations

Our Services may contain third party content, integrations or links to third party websites operated by organizations not affiliated with 23andMe. Through these integrations, you may be providing information to the third party as well as to 23andMe. Since we can only control our own Services, we are not responsible for how those third parties collect or use your information so please review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our Services.

Federal, State, and Region-Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, [residents of California and other states \(https://web.archive.org/web/20240920194451/https://www.23andme.com/about/california-privacy/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/about/california-privacy/) have specific privacy rights, as well as 23andMe [residents of the European Economic Area \(EEA\), the UK, Switzerland and other jurisdictions \(https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/eu-privacy-notice/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/eu-privacy-notice/).

Federal and state laws (including the federal Genetic Information Non-discrimination Act or "GINA") provide some protection from employer and health insurance discrimination based on your genetics. [Learn more \(https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-\)](https://web.archive.org/web/20240920194451/https://customercare.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-).

Retention of Personal Information

We retain Personal Information for as long as necessary to provide the Services and fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements, even if you chose to delete your account. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. We'll let you know about those changes here or by reaching out to you via email or some other contact method, such as through in-app notification, or on another website page or feature.

Contact Information

If you have questions about this Privacy Statement, or have a complaint or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20240920194451/mailto:privacy@23andme.com>), call us at 1.800.239.5230, or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Pt. Blvd
South San Francisco CA 94080

[Read the previous version of the document. \(https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/privacy/full-version/7.1/\)](https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/privacy/full-version/7.1/)



<https://www.23andme.com/>

SERVICES

[Health + Ancestry](https://www.23andme.com/dna-health-ancestry/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/dna-health-ancestry/>)

[Ancestry Service](https://www.23andme.com/dna-ancestry/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/dna-ancestry/>)

[23andMe+ Premium](https://www.23andme.com/membership/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/membership/>)

[23andMe+ Total Health](https://www.23andme.com/total-health/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/total-health/>)

[Gifts](https://www.23andme.com/gifts/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/gifts/>)

[Merchandise](https://merch.23andme.com/)

(<https://web.archive.org/web/20240920194451/https://merch.23andme.com/>)

COMPANY

[Investors](https://investors.23andme.com/) (<https://web.archive.org/web/20240920194451/https://investors.23andme.com/>)

[About Us](https://www.23andme.com/about/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/>)

[Stories](https://www.23andme.com/stories/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/stories/>)

[Surname Discovery](https://discover.23andme.com/)

(<https://web.archive.org/web/20240920194451/https://discover.23andme.com/>)

[Diversity, Equity & Inclusion](https://www.23andme.com/diversity-equity-inclusion/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/diversity-equity-inclusion/>)

[Media Center](https://mediacenter.23andme.com/)

(<https://web.archive.org/web/20240920194451/https://mediacenter.23andme.com/>)

[Blog](https://blog.23andme.com/) (<https://web.archive.org/web/20240920194451/https://blog.23andme.com/>)

[Genetics Learning Hub](https://www.23andme.com/topics/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/topics/>)

[Careers](https://www.23andme.com/careers/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/careers/>)

[Refer a Friend](https://refer.23andme.com/pub_footer_us)

(https://web.archive.org/web/20240920194451/https://refer.23andme.com/pub_footer_us)

[Return & Refund Policy](https://customer.23andme.com/hc/en-us/articles/202907780)

(<https://web.archive.org/web/20240920194451/https://customer.23andme.com/hc/en-us/articles/202907780>)

[Customer Care](https://customer.23andme.com/hc/en-us/)

(<https://web.archive.org/web/20240920194451/https://customer.23andme.com/hc/en-us/>)

[FSA/HSA Eligibility](https://www.23andme.com/fsa-hsa/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/fsa-hsa/>)

[Site Map](https://www.23andme.com/sitemap/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/sitemap/>)

DOWNLOAD APP



(<https://web.archive.org/web/20240920194451/https://itunes.apple.com/us/app/23andme/id952516687?ls=1&mt=8>)



(https://web.archive.org/web/20240920194451/https://play.google.com/store/apps/details?id=com.twentythreeandme.app&hl=en_US)

LEGAL

[Important Test Info](https://www.23andme.com/test-info/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/test-info/>)

[Terms of Service](https://www.23andme.com/legal/terms-of-service/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/terms-of-service/>)

[Privacy Statement](https://www.23andme.com/legal/privacy/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/privacy/>)

[Data Protection](https://www.23andme.com/gdpr/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/gdpr/>)

[Family Considerations](https://customer.23andme.com/hc/en-us/articles/202907980)

(<https://web.archive.org/web/20240920194451/https://customer.23andme.com/hc/en-us/articles/202907980>)

[Research Consent](https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/consent/>)

[Individual Data Consent](https://www.23andme.com/about/individual-data-consent/)

(<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/individual-data-consent/>)

[Biobanking Consent](https://www.23andme.com/about/biobanking/)

(<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/biobanking/>)

[Cookie Policy](https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookies/>)

[Cookie Choices](https://www.23andme.com/about/cookie-choices/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/about/cookie-choices/>)

[Patent Information](https://www.23andme.com/patents/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/patents/>)

[Report a Security Issue](https://www.23andme.com/security-report/) (<https://web.archive.org/web/20240920194451/https://www.23andme.com/security-report/>)

[Consumer Health Data Privacy Policy](https://www.23andme.com/legal/us-privacy/#washington-consumer-health-data-privacy-policy)

(<https://web.archive.org/web/20240920194451/https://www.23andme.com/legal/us-privacy/#washington-consumer-health-data-privacy-policy>)

PARTNER WITH US

[Healthcare Professionals](https://medical.23andme.com/)

(<https://web.archive.org/web/20240920194451/https://medical.23andme.com/>)

[Scientists](https://research.23andme.com/) (<https://web.archive.org/web/20240920194451/https://research.23andme.com/>)

[Therapeutics](https://therapeutics.23andme.com/)

(<https://web.archive.org/web/20240920194451/https://therapeutics.23andme.com/>)

[Business Development](https://therapeutics.23andme.com/contact/)

(<https://web.archive.org/web/20240920194451/https://therapeutics.23andme.com/contact/>)



[United States | Change](#)



(<https://web.archive.org/web/20240920194451/https://www.facebook.com/23andMe/>) (<https://web.archive.org/web/20240920194451/https://www.youtube.com/user/23andMe/>) (<https://www.instagram.com/23andme>)

Exhibit 4

Privacy Statement

Last Updated: December 14, 2022

What you should know about privacy at 23andMe

At 23andMe, Privacy is in our DNA.

This Privacy Statement applies to all websites owned and operated by 23andMe, including www.23andme.com (<https://web.archive.org/web/20230915153439/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services.

To keep things simple, we use the same terms here as in our [Terms of Service](https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/terms_of_service/) (https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/terms_of_service/). We'll let you know in this Privacy Statement if we have a new or different definition for a term. You should read our entire Privacy Statement, but if you only have a few minutes you can take a look at this [summary](https://web.archive.org/web/20230915153439/https://www.23andme.com/privacy/) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/privacy/>).

The information 23andMe collects

We try not to speak in legalese, but there are some useful definitions we use to describe data we collect in providing the Services to you.

When we say **Personal Information**, we use this as a general term to refer to the different data categories we describe in this section that either personally identify you or are about you. Your Personal Information can be either

- **Individual-level Information:** information about a single individual, such as their genotypes, diseases or other traits or characteristics.
- **De-identified Information:** information that has been stripped of identifying data, such as name and contact information, so that an individual cannot reasonably be identified.

Here are the types of Personal Information we collect:

- **Registration Information:** information you provide during account registration or when purchasing the Services, such as a name, user ID, password, date of birth, billing address, shipping address, payment information (e.g., credit card), account authentication information, or contact information (e.g., email, phone number).
- **Genetic Information:** information regarding your genotype (e.g., the As, Ts, Cs, and Gs at particular locations in your DNA). Genetic Information includes the 23andMe genetic data and reports provided to you as part of our Services.
- **Sample Information:** information regarding any sample, such as a saliva sample, that you submit for processing to be analyzed to provide you with Genetic Information, laboratory values or other data provided through our Services.
- **Self-Reported Information:** information you provide to 23andMe including your gender, disease conditions, health related information, traits, ethnicity, family history, or anything else you provide to us within our Service(s).
- **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials, other than Genetic Information and Self Reported Information, generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe. For example, User Content includes comments posted on our Blog or messages you send through our Services.
- **Web-Behavior Information:** information on how you use our Services or about the way your devices use our Services is collected through log files, cookies, web beacons, and similar technologies (e.g., device information, device identifiers, IP address, browser type, location, domains, page views).

Aggregate Information is different from Personal Information

Aggregate Information is not Personal Information because Aggregate Information does not contain information about, nor can it reasonably be linked to, a specific individual. Aggregate Information is information about a group of people, such as an analysis or evaluation of a group. Aggregate Information describes the group as a whole in such a way that no specific individual may be reasonably identified. For example, the number of 23andMe customers with a specific variant or health condition is Aggregate Information.

- **You:** We collect information you provide to us when you request or purchase Services or information from us, register with us (including when you link your account on a third party site or platform with your 23andMe account, such as via Google or Apple), participate in forums or other activities on our sites, features, and applications, respond to surveys, visit our physical properties, call our Customer Care support line, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.
- **Service Providers:** We may collect information through service providers who use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels, and tags when you visit, use or interact with our Services. For more detail on how we collect and use Web Behavior Information, please see our [Cookie Policy](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookies/). (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookies/>).
- **Other Third Parties:** We may receive information about you from other users, individuals, our corporate affiliates, or other third parties. For example, if someone gifts you a testing kit or Subscription, invites you to view their 23andMe Report, or otherwise refers you to 23andMe, we may collect information about you.
- **23andMe:** We may infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics. For example, we use your Genetic Information to predict certain health predispositions, or we may infer your location (such as city, state, and country) based on your IP address.

How we use your information

Now that we've covered the types of information we collect and how we collect it, let's review how we may use it. As a reminder, we will not use your Genetic Information for personalized or targeted marketing and/or advertising without your explicit consent. If you want to dig into the details of how we use your information, check out our [How We Use Your Information page](https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/how_we_use_info/) (https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/how_we_use_info/).

We use your information to:

- Provide our Services, including to develop, operate, improve, maintain, and safeguard our Services, including developing new product tools and features
- Analyze and measure trends and usage of the Services
- Communicate with you, including customer support, or to share information about our Services or other offers or information we think may be relevant to you
- Personalize, contextualize and market our Services to you
- Provide cross context behavioral or targeted advertising (learn more in our [Cookie Policy](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookies/). (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookies/>) and [Cookie Choices](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookie_choices/) (https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookie_choices/) page)
- Enhance the safety, integrity, and security of our Services, including prevention of fraud and other unauthorized or illegal activities on our Services
- Enforce, investigate, and report conduct violating our Terms of Service or other policies
- Conduct surveys or polls, and obtain testimonials or stories about you
- Comply with our legal, licensing, and regulatory obligations
- Conduct [23andMe Research](https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en_us/sections/200565350) (https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en_us/sections/200565350 Research and Surveys), if you choose to participate

What 23andMe Research participation means for you

23andMe has an opt in research program, meaning that for eligible customers, taking part in 23andMe Research is completely voluntary. Refer to the [Main Research Consent](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/>) for information to help you make an informed choice about participating. Here are key points about 23andMe Research, how Research uses personal information, and other ways we safeguard your privacy.

Before explaining how Research uses Personal Information, let's cover a few basics:

What is 23andMe Research?

The purpose of 23andMe Research is to make new discoveries about genetics and other factors behind diseases and traits. "23andMe Research" means research activities performed by 23andMe, either independently or jointly with third parties, and overseen by an independent ethics review board (also called an Institutional Review Board or "IRB"). 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, including non profit foundations, academic institutions or pharmaceutical companies.

What if I do *not* want to participate in Research?

If you are eligible to participate in Research, you choose whether to participate or not, and you can change your mind any time. Customers never need to participate in Research to use 23andMe. Nothing changes about your core 23andMe experience if you do not participate in Research. We do not use your information for Research unless you explicitly choose to participate in Research.

23andMe Research analyses are conducted with information that has been stripped of your identifying Registration Information. You can read more about protections for your data in the [Main Research Consent](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/>).

If you choose to consent to the **Main Research Consent**

(<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/>)...

- Your de identified [Genetic Information](#) and/or [Self Reported Information](#) may be used for Research.
- We may use de identified individual level [Genetic Information](#) and [Self Reported Information](#) internally at 23andMe for research purposes.
- We may share summaries of research results, which do not identify any particular individual, with qualified research collaborators and in scientific publications.
- We may inform you of research opportunities for which you may be eligible. We will not share individual level Personal Information without your explicit consent. To change your preferences for these communications, go to your [Account Settings](#) (<https://web.archive.org/web/20230915153439/https://you.23andme.com/user/edit/preferences/>).

Some participants choose to contribute in additional ways to Research. For example, you can choose to participate in [Individual Level Data Sharing](#) (https://web.archive.org/web/20230915153439/https://www.23andme.com/about/individual_data_consent/), or additional study specific agreement(s). Those consents are separate and, like the Main Research Consent, you can withdraw from them anytime. You should review those specific consents for the details. Take a look at your other [Research consent documents](#) (<https://web.archive.org/web/20230915153439/https://you.23andme.com/user/edit/research/>).

Data sharing

We appreciate the level of trust you put into us. Here's how we do, and do not share your information.

Who we share with:

Service providers: Our service providers and contractors help us provide our Services and act on our behalf to get things done. We implement procedures and maintain contractual terms with each service provider and contractor to protect the confidentiality and security of your Personal Information. For example, some of the things we use service providers and contractors to help us with include: order fulfillment and shipping; processing and analyzing your samples (check out the [How We Use Info page](#) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/how-we-use-info/>) to learn more!); sample storage (as we like to call it, “biobanking”); customer care support; cloud storage, IT, and security; marketing and analytics; and more. Learn more about cookies, analytics, and advertising partners we use on our Services in our [Cookie Policy](#) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/cookies/>).

Your sharing choices: You may direct us to share your Personal Information with friends, family members, doctors or other healthcare professionals, and/or any other individuals or entities who may or may not be using our Services, including through third party services such as social networks and third-party apps that connect to our Services. If you share your Personal Information with a third party, they may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved.

Commonly owned entities, affiliates and change of ownership: If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services.

Third parties related to law, harm, and the public interest: We can't say it enough – 23andMe will not provide information to law enforcement unless required by law to comply with a valid court order, subpoena, or search warrant. We require all law enforcement inquiries to follow a valid legal process, such as a court order or search warrant, and are prepared to exhaust available legal remedies to protect customer privacy. If we are compelled to disclose your Personal Information to law enforcement, we will try our best to provide you with prior notice, unless we are prohibited from doing so under the law.

23andMe will preserve and disclose any and all information if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe [Terms of Service](#) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/terms-of-service/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, officers, directors, contractors or other personnel, its users, and the public. Nothing in this Privacy Statement is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Personal Information.

Who we **DO NOT** share with:

You can rest assured, *we will not* voluntarily share your Personal Information with:

- Public databases
- Insurance companies or employers

Your privacy settings and controls

It's your data, and we make it easy to make decisions and certain choices about it. We do not make choices on your behalf for the privacy settings described below. Below are the types of controls you have in your Account Settings and we've listed what it means to opt-out or to opt-in:

Storing your sample

- Opt-out: No, I do not want my sample stored. If you choose to discard your sample, it will be securely destroyed after the lab completes its analysis, subject to laboratory legal and regulatory requirements. Note, a discard choice cannot be reversed.
- Opt-in: Yes, I want my sample stored. Learn more about [Biobanking](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/biobanking/>).

Viewing your health reports

- Opt-out: No, I do not want to receive my health reports.
- Opt-in: Yes, I do want to receive Genetic Health Risk and Carrier Status reports, as well as other reports (e.g., Pharmacogenetics reports) if available.

Sharing features

- Opt-out: No, I do not want to share my information with genetic relatives or other users via features like DNA Relatives or My Connections.
- Opt-in: Yes, I want to be able to share my information so I can discover genetic relatives or connect with others.

Personalized recommendations

- Opt-out: No, I do not want to receive Personalized Recommendations based on my sensitive data categories.
- Opt-in: Yes, I want to receive Personalized Recommendations to receive custom health and wellness recommendations, offers, and other information based on my sensitive data categories. Learn more about [Personalized Recommendations](https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/9295505340183) (<https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/9295505340183>).

Communications preferences

- Opt-out: Please don't contact me for promotional purposes. In addition to changing your preferences via Account Settings or your device, you can also click the "unsubscribe" button at the bottom of promotional email communications.
- Opt-in: Yes, you can contact me (such as through email, in-product notifications, or push notifications) for product or promotional purposes.

Research participation

- Opt-out: I don't want to participate in 23andMe Research. If you experience difficulties changing your consent status in Account Settings, contact the Human Protections Administrator at hpa@23andme.com. You can change your mind any time about your participation, however any Research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn.
- Opt-in: Yes, I'd like to participate in 23andMe Research. Learn more about [Research](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20230915153439/https://www.23andme.com/about/consent/>).

You can also:

Access & Download: You can access and download your Personal Information processed by 23andMe. Please note, if you lose access to your 23andMe Account, we require that you submit additional information to verify your identity before providing access or otherwise releasing information to you.

Correct Information: You can correct your Registration Information and modify Self-Reported Information entered into surveys.

Delete your Account: You can delete your 23andMe account within your Account Settings at any time. Upon account deletion, we will automatically opt you out of Research and discard your sample.

Keep in mind this process cannot be canceled, undone, withdrawn, or reversed, and your account deletion is subject to retention requirements. For exact instructions, please read our [Customer Care guidance](https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure) (<https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure>).

Security Measures

We implement physical, technical, and administrative measures aimed at preventing unauthorized access to or disclosure of your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your Personal Information. To learn more about our practices, please visit our [Customer Care guidance \(https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected\)](https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected).

Please recognize that protecting your Personal Information is also your responsibility. Be mindful of keeping your password and other authentication information safe from third parties, and immediately notify 23andMe of any unauthorized use of your login credentials. Your password is not visible to 23andMe staff, and we encourage you not to share your password with 23andMe or any third parties. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Third Party Content and Integrations

Our Services may contain third party content, integrations or links to third party websites operated by organizations not affiliated with 23andMe. Through these integrations, you may be providing information to the third party as well as to 23andMe. Since we can only control our own Services, we are not responsible for how those third parties collect or use your information so please review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our Services.

Federal, State, and Region-Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, [residents of California and other states \(https://web.archive.org/web/20230915153439/https://www.23andme.com/about/california-privacy/\)](https://web.archive.org/web/20230915153439/https://www.23andme.com/about/california-privacy/) have specific privacy rights, as well as 23andMe [residents of the European Economic Area \(EEA\), the UK, Switzerland and other jurisdictions \(https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/eu-privacy-notice/\)](https://web.archive.org/web/20230915153439/https://www.23andme.com/legal/eu-privacy-notice/).

Federal and state laws (including the federal Genetic Information Non-discrimination Act or "GINA") provide some protection from employer and health insurance discrimination based on your genetics. [Learn more \(https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-\)](https://web.archive.org/web/20230915153439/https://customercare.23andme.com/hc/en-us/articles/202907820-What-Is-GINA-).

Retention of Personal Information

We retain Personal Information for as long as necessary to provide the Services and fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements, even if you chose to delete your account. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. We'll let you know about those changes here or by reaching out to you via email or some other contact method, such as through in-app notification, or on another website page or feature.

Contact Information

If you have questions about this Privacy Statement, or have a complaint or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20230915153439/mailto:privacy@23andme.com>), call us at 1.800.239.5230, or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Pt. Blvd
South San Francisco CA 94080

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SERVICES

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[Ancestry Service](https://www.23andme.com/dna-ancestry/) [./web/20230915153439/https://www.23andme.com/dna-ancestry/](https://www.23andme.com/dna-ancestry/)

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COMPANY

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[About Us](https://www.23andme.com/about/) [./web/20230915153439/https://www.23andme.com/about/](https://www.23andme.com/about/)

[Diversity, Equity & Inclusion](https://www.23andme.com/diversity-equity-inclusion/) [./web/20230915153439/https://www.23andme.com/diversity-equity-inclusion/](https://www.23andme.com/diversity-equity-inclusion/)

[Media Center](https://mediacenter.23andme.com/)
[\(https://web.archive.org/web/20230915153439/https://mediacenter.23andme.com/\)](https://web.archive.org/web/20230915153439/https://mediacenter.23andme.com/)

[Blog](https://blog.23andme.com/) [\(https://web.archive.org/web/20230915153439/https://blog.23andme.com/\)](https://web.archive.org/web/20230915153439/https://blog.23andme.com/)

[Genetics Learning Hub](https://www.23andme.com/topics/) [./web/20230915153439/https://www.23andme.com/topics/](https://www.23andme.com/topics/)

[Careers](https://www.23andme.com/careers/) [./web/20230915153439/https://www.23andme.com/careers/](https://www.23andme.com/careers/)

[Refer a Friend](https://refer.23andme.com/pub_footer_us)
[./web/20230915153439/https://refer.23andme.com/pub_footer_us](https://web.archive.org/web/20230915153439/https://refer.23andme.com/pub_footer_us)

[Return & Refund Policy](https://customer.23andme.com/hc/en-us/articles/202907780)
[./web/20230915153439/https://customer.23andme.com/hc/en-us/articles/202907780](https://web.archive.org/web/20230915153439/https://customer.23andme.com/hc/en-us/articles/202907780)

[Customer Care](https://customer.23andme.com/hc/en-us/)
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[FSA/HSA Eligibility](https://www.23andme.com/fsa-hsa/) [./web/20230915153439/https://www.23andme.com/fsa-hsa/](https://www.23andme.com/fsa-hsa/)

[Site Map](https://www.23andme.com/sitemap/) [./web/20230915153439/https://www.23andme.com/sitemap/](https://www.23andme.com/sitemap/)

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[Data Protection](https://www.23andme.com/gdpr/) [./web/20230915153439/https://www.23andme.com/gdpr/](https://www.23andme.com/gdpr/)

[Family Considerations](https://customer.23andme.com/hc/en-us/articles/202907980)
[./web.archive.org/web/20230915153439/https://customer.23andme.com/hc/en-us/articles/202907980](https://web.archive.org/web/20230915153439/https://customer.23andme.com/hc/en-us/articles/202907980)

[Research Consent](https://www.23andme.com/about/consent/) [./web/20230915153439/https://www.23andme.com/about/consent/](https://www.23andme.com/about/consent/)

[Individual Data Consent](https://www.23andme.com/about/individual-data-consent/)
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[Biobanking Consent](https://www.23andme.com/about/biobanking/)
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certified



Exhibit 5

Privacy Statement

Last Updated: June 8, 2022

What you should know about privacy at 23andMe

At 23andMe, Privacy is in our DNA.

This Privacy Statement applies to all websites owned and operated by 23andMe, including www.23andme.com (<https://web.archive.org/web/20220909143047/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services.

To keep things simple, we use the same terms here as in our [Terms of Service](https://web.archive.org/web/20220909143047/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/tos/>). We'll let you know in this Privacy Statement if we have a new or different definition for a term. You should read our entire Privacy Statement, but if you only have a few minutes you can take a look at this [summary](https://web.archive.org/web/20220909143047/https://www.23andme.com/privacy/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/privacy/>).

The information 23andMe collects

We try not to speak in legalese, but there are some useful definitions we use to describe data we collect in providing the Services to you.

When we say **Personal Information**, we use this as a general term to refer to the different data categories we describe in this section that personally identify you. Your Personal Information can be either:

- **Individual-level Information:** information about a single individual, such as their genotypes, diseases or other traits or characteristics.
- **De-identified Information:** information that has been stripped of identifying data such that an individual cannot reasonably be identified.

Here are the types of information we collect:

- **Registration Information:** information you provide during account registration or when purchasing the Services, such as a name, user ID, password, date of birth, billing address, shipping address, payment information (e.g., credit card), account authentication information, or contact information (e.g., email, phone number).
- **Genetic Information:** information regarding your genotype (e.g., the As, Ts, Cs, and Gs at particular locations in your DNA). Genetic Information includes the 23andMe genetic data and reports provided to you as part of our Services.
- **Sample Information:** information regarding any sample, such as a saliva sample, that you submit for processing to be analyzed to provide you with Genetic Information, laboratory values or other data provided through our Services.
- **Self-Reported Information:** information you provide to 23andMe regarding your disease conditions, health related information, traits, ethnicity, family history, or anything else you provide to us within our Service(s).
- **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials, other than Genetic Information and Self Reported Information, generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe. For example, User Content includes comments posted on our Blog or messages you send through our Services.
- **Web-Behavior Information:** information on how you use our Services or about the way your devices use our Services is collected through log files, cookies, web beacons, and similar technologies (e.g., device information, device identifiers, IP address, browser type, domains, page views).

Aggregate Information is different from Personal Information

Aggregate Information is not Personal Information because Aggregate Information does not contain information about a specific individual. Aggregate Information is information about a group of people where names and contact information are stripped and the remaining data is combined with that of other individuals and is analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.

How we collect information

- **You:** We collect information you provide to us when you request or purchase Services or information from us, register with us (including when you link your account on a third party site or platform with your 23andMe account, such as via Google or Apple), participate in forums or other activities on our sites,

- **Service Providers:** We may collect information through service providers who use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels, and tags when you visit, use or interact with our Services. For more detail on how we collect and use Web Behavior Information, please see our [Cookie Policy](https://web.archive.org/web/20220909143047/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/cookies/>).
- **Other Third Parties:** We may receive information about you from other users, individuals, our corporate affiliates, or other third parties. For example, if someone gifts you a testing kit or Subscription, invites you to view their 23andMe Report, or otherwise refers you to 23andMe, we may collect information about you.

How we use your information

Now that we've covered the types of information we collect and how we collect it, let's review how we may use it. As a reminder, we do not sell information, and we will not use your Genetic Information for marketing or personalized advertising without your explicit consent. If you want to dig into the details of how we use your information, check out our [How We Use Your Information page](https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/how-we-use-info/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/how-we-use-info/>).

We use your information to:

- Provide our Services, including to develop, operate, improve, maintain, and safeguard our Services
- Analyze and measure trends and usage of the Services
- Communicate with you, this includes customer support, or to share information about our Services or other offers or information we think may be relevant to you
- Personalize or contextualize our Services to you
- Enhance the safety, integrity, and security of our Services, including prevention of fraud and other unauthorized or illegal activities on our Services
- Enforce, investigate, and report conduct violating our Terms of Service or other policies
- Conduct surveys or polls, and obtain testimonials or stories about you
- Comply with our legal, licensing, and regulatory obligations
- Conduct [23andMe Research](https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/sections/200565350) (<https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/sections/200565350> [Research and Surveys](https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/how-we-use-info/)) if you choose to participate

What 23andMe Research participation means for you

23andMe has an opt in research program, meaning that for eligible customers, taking part in 23andMe Research is completely voluntary. Refer to the [Main Research Consent](https://web.archive.org/web/20220909143047/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/consent/>) for information to help you make an informed choice about participating. Here are key points about 23andMe Research, how Research uses personal information, and other ways we safeguard your privacy.

Before explaining how Research uses Personal Information, let's cover a few basics:

What is 23andMe Research?

The purpose of 23andMe Research is to make new discoveries about genetics and other factors behind diseases and traits. "23andMe Research" means research activities performed by 23andMe, either independently or jointly with third parties, and overseen by an independent ethics review board (also called an Institutional Review Board or "IRB"). 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, including non profit foundations, academic institutions or pharmaceutical companies. For more information on our academic collaborations, see [Research](https://web.archive.org/web/20220909143047/https://www.23andme.com/research/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/research/>).

What if I do not want to participate in Research?

If you are eligible to participate in Research, you choose whether to participate or not, and you can change your mind any time. Customers never need to participate in Research to use 23andMe. Nothing changes about your core 23andMe experience if you do not participate in Research. We do not use your information for Research unless you choose to specifically participate in Research.

How does 23andMe protect my information in Research?

23andMe Research analyses are conducted with information that has been stripped of your identifying Registration Information.

- Your de-identified Genetic Information and/or Self Reported Information may be used for Research.
- We may use de-identified individual level Genetic Information and Self Reported Information internally at 23andMe for research purposes.
- We may share summaries of research results, which do not identify any particular individual, with qualified research collaborators and in scientific publications.
- We may inform you of research opportunities for which you may be eligible. We will not share individual level Personal Information without your explicit consent. To change your preferences for these communications, go to your Account Settings (<https://web.archive.org/web/20220909143047/https://you.23andme.com/user/edit/preferences/>).

Some participants choose to contribute in additional ways to Research. For example, you can choose to participate in Individual Level Data Sharing (https://web.archive.org/web/20220909143047/https://www.23andme.com/about/individual_data_consent/), or additional study specific agreement(s). Those consents are separate and, like the Main Research Consent, you can withdraw from them anytime. You should review those specific consents for the details. Take a look at your other Research consent documents (<https://web.archive.org/web/20220909143047/https://you.23andme.com/user/edit/research/>).

Data sharing

We appreciate the level of trust you put into us. Here's how we do, and do not share your information.

Who we share with:

Service providers: Our service providers help us provide our Services and act on our behalf to get things done. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your Personal Information. For example, some of the things we use service providers to help us with include: order fulfillment and shipping; processing and analyzing your samples (check out the How We Use Info page (<https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/how-we-use-info/>) to learn more!); sample storage (as we like to call it, "biobanking"); customer care support; cloud storage, IT, and security; marketing and analytics; and more.

Your sharing choices: You may direct us to share your Personal Information with friends, family members, doctors or other healthcare professionals, and/or any other individuals or entities who may or may not be using our Services, including through third party services such as social networks and third-party apps that connect to our Services. If you share your Personal Information with a third party, they may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved.

Commonly owned entities, affiliates and change of ownership: If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your Personal Information may be accessed, sold or transferred as part of that transaction and this Privacy Statement will apply to your Personal Information as transferred to the new entity. We may also disclose Personal Information about you to our corporate affiliates to help operate our services and our affiliates' services.

Third parties related to law, harm, and the public interest: We can't say it enough – 23andMe will not provide information to law enforcement or regulatory authorities unless required by law to comply with a valid court order, subpoena, or search warrant for Genetic or Personal Information. We require all law enforcement inquiries to follow a valid legal process, such as a court order or search warrant, and are prepared to exhaust available legal remedies to protect customer privacy. If we are compelled to disclose your Personal Information to law enforcement or regulatory authorities, we will try our best to provide you with prior notice, unless we are prohibited from doing so under the law.

23andMe will preserve and disclose any and all information if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, officers, directors, contractors or other personnel, its users, and the public. Nothing in this Privacy Statement is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Personal Information.

Who we **DO NOT** share with:

You can rest assured, *we will not* voluntarily share your Personal Information with:

- Public databases
- Insurance companies or employers
- Law enforcement or regulatory authorities (Check out our track record on this promise in our Transparency Report (<https://web.archive.org/web/20220909143047/https://www.23andme.com/transparency-report/>))

It's your data, and we make it easy to make decisions and choices about it. Below are the types of controls you have in your Account Settings and we've listed what it means to opt-out or to opt-in:

Storing your sample

- Opt-out: No, I do not want my sample stored. If you choose to discard your sample, it will be securely destroyed after the lab completes its analysis, subject to laboratory legal and regulatory requirements. Note, a discard choice cannot be reversed.
- Opt-in: Yes, I want my sample stored. Learn more about [Biobanking](https://web.archive.org/web/20220909143047/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/biobanking/>).

Viewing your health reports

- Opt-out: No, I do not want to receive my health reports.
- Opt-in: Yes, I do want to receive Genetic Health Risk and Carrier Status reports, as well as other reports (e.g., Pharmacogenetics reports) if available.

Sharing features

- Opt-out: No, I do not want to share my information with genetic relatives or other users via features like DNA Relatives or My Connections.
- Opt-in: Yes, I want to be able to share my information so I can discover genetic relatives or connect with others.

Communications preferences

- Opt-out: Please don't contact me for product or promotional purposes. In addition to changing your preferences via Account Settings or your device, you can also click the "unsubscribe" button at the bottom of promotional email communications.
- Opt-in: Yes, you can contact me (such as through email, in-product notifications, or push notifications) for product or promotional purposes.

Research participation

- Opt-out: I don't want to participate in 23andMe Research. If you experience difficulties changing your consent status in Account Settings, contact the Human Protections Administrator at hpa@23andme.com. You can change your mind any time about your participation, however any Research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn.
- Opt-in: Yes, I'd like to participate in 23andMe Research.

You can also:

Access & Download: You can access and download your Personal Information processed by 23andMe. Please note, if you lose access to your 23andMe Account, we require that you submit additional information to verify your identity before providing access or otherwise releasing information to you.

Correct Information: You can correct your Registration Information and modify Self-Reported Information entered into surveys.

Delete your Account: You can delete your 23andMe account within your Account Settings at any time. Upon account deletion, we will automatically opt you out of Research and discard your sample.

Keep in mind this process cannot be cancelled, undone, withdrawn, or reversed. For exact instructions, please read our [Customer Care guidance](https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure) (<https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/212170688-Requesting-23andMe-Account-Closure>).

Other things to know about privacy

Security Measures

We implement physical, technical, and administrative measures aimed at preventing unauthorized access to or disclosure of your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your Personal Information. To learn more about our practices, please visit our [Customer Care guidance](https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected) (<https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/202907840-How-Is-My-Personal-Information-Protected>).

Please recognize that protecting your Personal Information is also your responsibility. Be mindful of keeping your password and other authentication information safe from third parties, and immediately notify 23andMe of any unauthorized use of your login credentials. Your password is not visible to 23andMe staff, and we encourage you not to share your password with 23andMe or any third parties. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Our Services may contain third party content, integrations or links to third party websites operated by organizations not affiliated with 23andMe. Through these integrations, you may be providing information to the third party as well as to 23andMe. Since we can only control our own Services, we are not responsible for how those third parties collect or use your information so please review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our Services.

State and Region-Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, residents of California and other states (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/california-privacy/>), have specific privacy rights, as well as 23andMe residents of the European Economic Area (EEA), the UK, Switzerland and other jurisdictions (<https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/eu-privacy-notice/>).

Legal Retention Requirements

23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. We'll let you know about those changes here or by reaching out to you via email or some other contact method, such as through in-app notification, or on another website page or feature.

Contact Information

If you have questions about this Privacy Statement, or have a complaint or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20220909143047/mailto:privacy@23andme.com>), call us at 1.800.239.5230, or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Pt. Blvd
South San Francisco CA 94080

[Read the previous version of the document.](https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/privacy/full-version/6.5/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/privacy/full-version/6.5/>).



<https://web.archive.org/web/20220909143047/https://www.23andme.com/>

SERVICES

[Health + Ancestry](https://web.archive.org/web/20220909143047/https://www.23andme.com/dna-health-ancestry/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/dna-health-ancestry/>)

[Ancestry + Traits](https://web.archive.org/web/20220909143047/https://www.23andme.com/dna-ancestry/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/dna-ancestry/>)

[23andMe+ Membership](https://web.archive.org/web/20220909143047/https://www.23andme.com/membership/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/membership/>)

[Gifts](https://web.archive.org/web/20220909143047/https://www.23andme.com/gifts/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/gifts/>)

COMPANY

[Investors](https://web.archive.org/web/20220909143047/https://investors.23andme.com/) (<https://web.archive.org/web/20220909143047/https://investors.23andme.com/>)

[About Us](https://web.archive.org/web/20220909143047/https://www.23andme.com/about/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/about/>)

[Diversity, Equity & Inclusion](https://web.archive.org/web/20220909143047/https://www.23andme.com/equity-inclusion/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/equity-inclusion/>)

[Media Center](https://web.archive.org/web/20220909143047/https://mediacenter.23andme.com/)
(<https://web.archive.org/web/20220909143047/https://mediacenter.23andme.com/>)

[Blog](https://web.archive.org/web/20220909143047/https://blog.23andme.com/) (<https://web.archive.org/web/20220909143047/https://blog.23andme.com/>)

[Genetics Learning Hub](https://web.archive.org/web/20220909143047/https://www.23andme.com/topi-genetics-learning-hub/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/topi-genetics-learning-hub/>)

[Careers](https://web.archive.org/web/20220909143047/https://www.23andme.com/careers/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/careers/>)

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(<https://web.archive.org/web/20220909143047/https://refer.23andme.com/public/>)

[Return Policy](https://web.archive.org/web/20220909143047/https://customer.23andme.com/articles/202907780/)
(<https://web.archive.org/web/20220909143047/https://customer.23andme.com/articles/202907780/>)

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[Important Test Info](https://web/20220909143047/https://www.23andme.com/test-info/) (<https://web/20220909143047/https://www.23andme.com/test-info/>)

[Terms of Service](https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/terms-of-service/) (<https://web.archive.org/web/20220909143047/https://www.23andme.com/legal/terms-of-service/>)

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[Data Protection](https://web/20220909143047/https://www.23andme.com/gdpr/) (<https://web/20220909143047/https://www.23andme.com/gdpr/>)

[Family Considerations](https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/202907980)

(<https://web.archive.org/web/20220909143047/https://customercare.23andme.com/hc/en-us/articles/202907980>)

[Research Consent](https://web/20220909143047/https://www.23andme.com/about/consent/) (<https://web/20220909143047/https://www.23andme.com/about/consent/>)

[Individual Data Consent](https://web/20220909143047/https://www.23andme.com/about/individual-data-consent/) (<https://web/20220909143047/https://www.23andme.com/about/individual-data-consent/>)

[Biobanking Consent](https://web/20220909143047/https://www.23andme.com/about/biobanking/) (<https://web/20220909143047/https://www.23andme.com/about/biobanking/>)

[Cookie Policy](https://web/20220909143047/https://www.23andme.com/about/cookies/) (<https://web/20220909143047/https://www.23andme.com/about/cookies/>)

[Ad Choices](https://web/20220909143047/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options) (<https://web/20220909143047/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options>)

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[Therapeutics](https://web.archive.org/web/20220909143047/https://therapeutics.23andme.com/)

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(<https://web.archive.org/web/20220909143047/https://www.youtube.com/23andMe/>)



Exhibit 6

Privacy Highlights

Last Updated: February 3, 2022

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de identified Genetic Information and Self Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or others outside our Services, including through third party services that accept 23andMe data and social networks.
- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can consent to the use of your de identified data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared in the following ways:

- **With our service providers**, as necessary for them to provide their services to us.
- **With qualified research collaborators**, only if you provide your explicit consent.

23andMe will not sell, lease, or rent your individual level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any **public databases**.
- **We will not** provide any person's data (genetic or non genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](#)

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to, the following areas:

- **Independent security certification and audit.** Our information security management system, which protects 23andMe information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi factor authentication, single sign on, and a strict least privileged authorization policy.

Risks and Considerations

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.
- In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.

Full Privacy Statement

Last Updated: February 3, 2022

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including www.23andme.com (<https://web.archive.org/web/20220603071913/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/>). Unless otherwise defined in this Privacy Statement, terms used in this Privacy Statement have the same meanings as terms defined in our [Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service, you should immediately discontinue use of our Services.

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 - [To process, analyze and deliver your genetic testing results](#)
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 - [To allow you to share your Personal Information for research purposes](#)
 - [To recruit you for external research](#)
 - [To provide customer support](#)
 - [To conduct surveys or polls, and obtain testimonials](#)
 - [To provide you with marketing communications](#)
4. [Information we share with third parties](#)
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 - [Aggregate Information](#)

◦ ~~Information we share with commonly owned entities:~~

- As required by law
- Business Transactions

5. Your choices

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- Marketing communications
- Sharing outside of the 23andMe Services
- Account Deletion

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12. Do-Not-Track Statement

13. Changes to this Privacy Statement

14. Contact information

1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, either through the Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - e. **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Inferences and Derived Data:** information, data, assumptions, or conclusions that are derived directly or indirectly from another source of Personal Information. For example, we may use statistical techniques to infer additional genetic information based on genetic information generated directly through the processing of your saliva sample.
 - g. **Web-Behavior Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., device information (device identifiers), IP address, browser type, domains, page views).

2. Information we collect

a. **Information you provide directly to us or through a third party**

- i. **Registration Information.** When you purchase our Services or create a 23andMe account, we collect Personal Information, which may include your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and

- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
 - iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Forums.
 - iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.
 - v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the third party social media service. Features are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.
 - vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
 - vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
 - viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20220603071913/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002) (<https://web.archive.org/web/20220603071913/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002>).
 - ix. **Gifts.** If you provide us with Personal Information about others, if others give us your information, or if you authorize another individual to share or send your Personal Information to our third party service provider(s) for the purpose of ordering the Service or other personalized gift(s), we will only use that information for the purpose for which it was provided to us. These purposes may include, for example, where you provide us with a friend's shipping address when placing an order or where you authorize a family member to order personalized merchandise based on your ancestry report results. Once a gift recipient registers for our Services and agrees to our [Privacy Statement](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser. Information shared directly with our third party service provider(s) for personalized gifts are subject to such third party's terms of service and privacy policies.
 - x. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20220603071913/https://customercare.23andme.com/) (<https://web.archive.org/web/20220603071913/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.
- b. **Information related to our genetic testing services**

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to us or our third party laboratory. Your DNA will be extracted from your saliva sample for analysis. During kit registration you are asked to review our [Consent Document for Sample Storage and Additional Genetic Analyses](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage (“Biobanking”) and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to laboratory legal and regulatory requirements. You can update your Biobanking preference to discard a stored sample within your 23andMe Account Settings once your sample has completed processing.
 - ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.
- c. **Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**
- We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:
- i. help us recognize you when you use our Services;
 - ii. customize and improve your experience;
 - iii. provide security;
 - iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
 - v. gather demographic information about our user base;
 - vi. offer our Services to you;
 - vii. monitor the success of marketing programs; and
 - viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/), (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in Section 4.c).

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data here** (<https://web.archive.org/web/20220603071913/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://web.archive.org/web/20220603071913/https://www.google.com/settings/ads) (<https://web.archive.org/web/20220603071913/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20220603071913/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20220603071913/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and to analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area (“EEA”), United Kingdom, or Switzerland (collectively the “Designated Countries”): We process your Personal Information in this way to provide our Services to you in accordance with our [Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/en-eu/about/tos/), (<https://web.archive.org/web/20220603071913/https://www.23andme.com/en-eu/about/tos/>).

b. **To process, analyze and deliver your genetic testing results**

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As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to be genotyped by us or our contracted laboratory. Once genotyped, we further analyze your Genetic Information to provide you with our health and/or ancestry reports, depending on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your 23andMe Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share Sensitive Information.

You should be thoughtful about your sharing choices. Once you have chosen to share any Personal Information, the individuals with whom you share this information, may also use or share your Personal Information, including any Sensitive Information you choose to share.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health ("NIH")) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the main Research Consent Document:
(<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/consent/>).

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent

(<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the main Research Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20220603071913/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in Section 5.d.).

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of our Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your 23andMe Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to us or to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to us or our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. For samples processed by our third party genotyping laboratory, when the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your 23andMe Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion), our genotyping laboratory or contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to our Service. Our IT and security service providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.

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v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): Where Personal Information are transferred to a third country or to an international organisation, 23andMe implements appropriate safeguards, such as contractual obligations, relating to the transfer.

b. "Targeted advertising" service providers

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

For more information about our marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/>).

c. Aggregate information

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20220603071913/https://www.23andme.com/transparency-report/>) for more information.

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your 23andMe Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your 23andMe Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h, you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your 23andMe Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your 23andMe Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to the following areas:

- **ISO/IEC 27001:2013 certification.** Our information security management system, which protects 23andMe systems, has been certified under the ISO/IEC 27001:2013 standard. View or download our certification [here](https://web.archive.org/web/20220603071913/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf).
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. International Transfers

Your Personal Information will likely be transferred to, stored, and processed in the U.S. and other countries outside of where you live. When we conduct such transfers, we rely on various legal bases to lawfully transfer Personal Information around the world, including the European Union Commission approved model contractual clauses.

In addition to such lawful data transfer mechanisms, 23andMe continues to participate in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union ("EU"), European Economic Area ("EEA"), and Switzerland to the United States, respectively. 23andMe remains committed to applying the Privacy Shield Framework's applicable Principles to Personal Information received from the EU, EEA and Switzerland. If there is any conflict between the terms in this Privacy Statement and applicable Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the U.S. [Department of Commerce's Privacy Shield List](https://web.archive.org/web/20220603071913/https://www.privacyshield.gov/list) (<https://web.archive.org/web/20220603071913/https://www.privacyshield.gov/list>).

23andMe is responsible for the processing of Personal Information it receives or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with applicable data protection law, including Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions in the Privacy Shield Principles.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have questions about our Privacy Shield certification, we encourage you to contact us privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>).

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your 23andMe Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiation of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your 23andMe Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests of 23andMe. E.g., where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. Privacy Rights

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your 23andMe Account Settings, and your Self-Reported Information by going to the surveys page, and other information as required by applicable law. You can download your raw Genetic Information within your 23andMe Account Settings or by going to the applicable tool in "Tools". If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. (Account Deletion), we allow you to delete your account at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request your Personal Information in a structured, commonly used and machine-readable format. You may also request the transfer of your Personal Information directly to another controller, where technically feasible, unless choosing to exercise this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you delete your account, we will take the steps described under "Your Choices – Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. Complaints

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Privacy Officer
23andMe, Inc.,
349 Oyster Point Blvd,
South San Francisco, CA 94080
1.800.239.5230,
privacy@23andme.com (<https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com>)

23andMe has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> (https://web.archive.org/web/20220603071913/https://bbbprograms.org/privacy-shield-complaints/) for more information and to file a complaint. This service is provided free of charge to you.

As a last resort and under limited circumstances, individuals from Designated Countries with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in the country of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20220603071913/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. California Residents

Pursuant to the California Consumer Privacy Act of 2018, California residents are afforded certain additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit our [Privacy Notice for California Residents](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/california-privacy/) (https://web.archive.org/web/20220603071913/https://www.23andme.com/about/california-privacy/).

11. Nevada Residents

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. 23andMe does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at [privacy@23andme.com](https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com) (https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com).

12. Do Not Track Statement

Some browsers have a "do not track" feature that allows you to tell websites that you do not want to have your online activities tracked. At this time, due to a lack of industry standards, we do not respond to browser "do not track" signals. To learn more about interest-based advertising or to opt-out of this type of advertising, visit the [Network Advertising Initiative website](https://web.archive.org/web/20220603071913/https://www.networkadvertising.org/choices) (https://web.archive.org/web/20220603071913/https://www.networkadvertising.org/choices) and the [Digital Advertising Alliance website](https://web.archive.org/web/20220603071913/http://www.aboutads.info/choices) (https://web.archive.org/web/20220603071913/http://www.aboutads.info/choices). Options you select are browser- and device-specific.

13. Changes to this Privacy Statement

23andMe modifies this Privacy Statement from time to time. We recommend revisiting this page periodically to stay aware of any changes to this Privacy Statement. If we modify this Privacy Statement, we'll make it available through our website. Whenever material changes to this Privacy Statement are made, we will provide you with notice before the modifications are effective, such as by posting a notice on our website or sending a message to the email address associated with your account.

By continuing to access or use the Services after changes to this Privacy Statement becomes effective, you agree to be bound by the revised Privacy Statement. If any changes are unacceptable to you, you may stop using our Services and delete your account at any time.

We also may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

14. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at [privacy@23andme.com](https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com) (https://web.archive.org/web/20220603071913/mailto:privacy@23andme.com), or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Point Blvd
South San Francisco, CA 94080
1.800.239.5230

[Read the previous version of the document. \(?version=6.4\)](https://web.archive.org/web/20220603071913/https://www.23andme.com/?version=6.4)

[Health + Ancestry](https://web.archive.org/web/20220603071913/https://www.23andme.com/dna-health-ancestry/) (/web/20220603071913/https://www.23andme.com/dna-health-ancestry/)

[Ancestry + Traits](https://web.archive.org/web/20220603071913/https://www.23andme.com/dna-ancestry/) (/web/20220603071913/https://www.23andme.com/dna-ancestry/)

[23andMe+ Membership](https://web.archive.org/web/20220603071913/https://www.23andme.com/membership/) (/web/20220603071913/https://www.23andme.com/membership/)

[Gifts](https://web.archive.org/web/20220603071913/https://www.23andme.com/gifts/) (/web/20220603071913/https://www.23andme.com/gifts/)

[Investors](https://web.archive.org/web/20220603071913/https://investors.23andme.com/) (https://web.archive.org/web/20220603071913/https://investors.23andme.com/)

[About Us](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/) (/web/20220603071913/https://www.23andme.com/about/)

[Diversity, Equity & Inclusion](https://web.archive.org/web/20220603071913/https://www.23andme.com/equity-inclusion/) (/web/20220603071913/https://www.23andme.com/equity-inclusion/)

[Media Center](https://web.archive.org/web/20220603071913/https://mediacenter.23andme.com/)

(https://web.archive.org/web/20220603071913/https://mediacenter.23andme.com/)

[Blog](https://web.archive.org/web/20220603071913/https://blog.23andme.com/) (https://web.archive.org/web/20220603071913/https://blog.23andme.com/)

[Topics](https://web.archive.org/web/20220603071913/https://www.23andme.com/topics/) (/web/20220603071913/https://www.23andme.com/topics/)

[Careers](https://web.archive.org/web/20220603071913/https://www.23andme.com/careers/) (/web/20220603071913/https://www.23andme.com/careers/)

[Refer a Friend](https://web.archive.org/web/20220603071913/https://refer.23andme.com/pub_fc)

(https://web.archive.org/web/20220603071913/https://refer.23andme.com/pub_fc)

[Return Policy](https://web.archive.org/web/20220603071913/https://customer.23andme.com/us/articles/202907780)

(https://web.archive.org/web/20220603071913/https://customer.23andme.com/us/articles/202907780)

[Customer Care](https://web.archive.org/web/20220603071913/https://customer.23andme.com/us/)

(https://web.archive.org/web/20220603071913/https://customer.23andme.com/us/)

[FSA/HSA Eligibility](https://web.archive.org/web/20220603071913/https://www.23andme.com/fsa-hsa/) (/web/20220603071913/https://www.23andme.com/fsa-hsa/)

[Site Map](https://web.archive.org/web/20220603071913/https://www.23andme.com/sitemap/) (/web/20220603071913/https://www.23andme.com/sitemap/)

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[Important Test Info](https://web.archive.org/web/20220603071913/https://www.23andme.com/test-info/) (/web/20220603071913/https://www.23andme.com/test-info/)

[Terms of Service](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/tos/) (/web/20220603071913/https://www.23andme.com/about/tos/)

[Privacy Statement](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/privacy/) (/web/20220603071913/https://www.23andme.com/about/privacy/)

[Data Protection](https://web.archive.org/web/20220603071913/https://www.23andme.com/gdpr/) (/web/20220603071913/https://www.23andme.com/gdpr/)

[Family Considerations](https://web.archive.org/web/20220603071913/https://customer.23andme.com/hc/en-us/articles/202907980)

(https://web.archive.org/web/20220603071913/https://customer.23andme.com/hc/en-us/articles/202907980)

[Research Consent](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/consent/) (/web/20220603071913/https://www.23andme.com/about/consent/)

[Individual Data Consent](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/individual-data-consent/) (/web/20220603071913/https://www.23andme.com/about/individual-data-consent/)

[Biobanking Consent](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/biobanking/) (/web/20220603071913/https://www.23andme.com/about/biobanking/)

[Cookie Policy](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/) (/web/20220603071913/https://www.23andme.com/about/cookies/)

[Ad Choices](https://web.archive.org/web/20220603071913/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options) (/web/20220603071913/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options)

[Patent Information](https://web.archive.org/web/20220603071913/https://www.23andme.com/patents/) (/web/20220603071913/https://www.23andme.com/patents/)

[Report a Security Issue](https://web.archive.org/web/20220603071913/https://www.23andme.com/security-report/) (/web/20220603071913/https://www.23andme.com/security-report/)

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[Medical Professionals](https://web.archive.org/web/20220603071913/https://medical.23andme.com/)

(https://web.archive.org/web/20220603071913/https://medical.23andme.com/)

[Educators](https://web.archive.org/web/20220603071913/https://education.23andme.com/)

(https://web.archive.org/web/20220603071913/https://education.23andme.com/)

[Scientists](https://web.archive.org/web/20220603071913/https://research.23andme.com/) (https://web.archive.org/web/20220603071913/https://research.23andme.com/)

[Therapeutics](https://web.archive.org/web/20220603071913/https://therapeutics.23andme.com/)

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Exhibit 7

Privacy Highlights

Last Updated: January 25, 2022

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de identified Genetic Information and Self Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or others outside our Services, including through third party services that accept 23andMe data and social networks.
- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can consent to the use of your de identified data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared in the following ways:

- **With our service providers**, as necessary for them to provide their services to us.
- **With qualified research collaborators**, only if you provide your explicit consent.

23andMe will not sell, lease, or rent your individual level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any **public databases**.
- **We will not** provide any person's data (genetic or non genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](#)

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data. Our team regularly reviews and improves our security. (<https://web.archive.org/web/20220131232259/https://www.23andme.com/transparency-report/>)

- **Independent security certification and audit.** Our information security management system, which protects 23andMe information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi factor authentication, single sign on, and a strict least privileged authorization policy.

Risks and Considerations

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.
- In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.

Full Privacy Statement

Last Updated: January 25, 2022

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including [www.23andme.com](https://web.archive.org/web/20220131232259/https://www.23andme.com/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/>). Unless otherwise defined in this Privacy Statement, terms used in this Privacy Statement have the same meanings as terms defined in our [Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service, you should immediately discontinue use of our Services.

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1. Key Definitions

- Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
- De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
- Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
- Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - Self-Reported Information:** information you provide directly to us, either through the Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - Inferences and Derived Data:** information, data, assumptions, or conclusions that are derived directly or indirectly from another source of Personal Information. For example, we may use statistical techniques to infer additional genetic information based on genetic information generated directly through the processing of your saliva sample.
 - Web-Behavior Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., device information (device identifiers), IP address, browser type, domains, page views).

2. Information we collect

a. **Information you provide directly to us or through a third party**

- Registration Information.** When you purchase our Services or create a 23andMe account, we collect Personal Information, which may include your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).

- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features, and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
 - iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Forums.
 - iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.
 - v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the third party social media service. Features are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.
 - vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
 - vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
 - viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20220131232259/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002) (<https://web.archive.org/web/20220131232259/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002>).
 - ix. **Gifts.** If you provide us with Personal Information about others, if others give us your information, or if you authorize another individual to share or send your Personal Information to our third party service provider(s) for the purpose of ordering the Service or other personalized gift(s), we will only use that information for the purpose for which it was provided to us. These purposes may include, for example, where you provide us with a friend's shipping address when placing an order or where you authorize a family member to order personalized merchandise based on your ancestry report results. Once a gift recipient registers for our Services and agrees to our [Privacy Statement](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser. Information shared directly with our third party service provider(s) for personalized gifts are subject to such third party's terms of service and privacy policies.
 - x. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20220131232259/https://customercare.23andme.com/) (<https://web.archive.org/web/20220131232259/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.
- b. **Information related to our genetic testing services**
- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to us or our third party laboratory. Your DNA will be extracted

from your saliva sample for analysis. During kit registration you are asked to review our [Consent Document for Sample Storage and Additional Genetic Analyses](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage (“Biobanking”) and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to laboratory legal and regulatory requirements. You can update your Biobanking preference to discard a stored sample within your 23andMe Account Settings once your sample has completed processing.

- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.

c. **Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- i. help us recognize you when you use our Services;
- ii. customize and improve your experience;
- iii. provide security;
- iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- v. gather demographic information about our user base;
- vi. offer our Services to you;
- vii. monitor the success of marketing programs; and
- viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/), (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in Section 4.c).

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](https://web.archive.org/web/20220131232259/https://policies.google.com/technologies/partner-sites)** (<https://web.archive.org/web/20220131232259/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://web.archive.org/web/20220131232259/https://www.google.com/settings/ads) (<https://web.archive.org/web/20220131232259/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20220131232259/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20220131232259/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and to analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area (“EEA”), United Kingdom, or Switzerland (collectively the “Designated Countries”): We process your Personal Information in this way to provide our Services to you in accordance with our [Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/en-eu/about/tos/), (<https://web.archive.org/web/20220131232259/https://www.23andme.com/en-eu/about/tos/>).

b. **To process, analyze and deliver your genetic testing results**

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As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to be genotyped by us or our contracted laboratory. Once genotyped, we further analyze your Genetic Information to provide you with our health and/or ancestry reports, depending on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your 23andMe Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share Sensitive Information.

You should be thoughtful about your sharing choices. Once you have chosen to share any Personal Information, the individuals with whom you share this information, may also use or share your Personal Information, including any Sensitive Information you choose to share.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health ("NIH")) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the main Research Consent Document: (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/consent/>).

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent

(<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the main Research Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20220131232259/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in Section 5.d.).

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of our Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your 23andMe Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to us or to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to us or our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. For samples processed by our third party genotyping laboratory, when the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your 23andMe Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion), our genotyping laboratory or contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to our Service. Our IT and security service providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.

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v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): Where Personal Information are transferred to a third country or to an international organisation, 23andMe implements appropriate safeguards, such as contractual obligations, relating to the transfer.

b. "Targeted advertising" service providers

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

For more information about our marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/>).

c. Aggregate information

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20220131232259/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20220131232259/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your 23andMe Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

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You may access, correct or update most of your Registration Information on your own within your 23andMe Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the [surveys page](#) (https://web.archive.org/web/20220131232259/https://you.23andme.com/research/all_questions_dashboard/), by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h, you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your 23andMe Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your 23andMe Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to the following areas:

- **ISO/IEC 27001:2013 certification.** Our information security management system, which protects 23andMe systems, has been certified under the ISO/IEC 27001:2013 standard. View or download our certification [here](#). (https://web.archive.org/web/20220131232259/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf)
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. International Transfers

Your Personal Information will likely be transferred to, stored, and processed in the U.S. and other countries outside of where you live. When we conduct such transfers, we rely on various legal bases to lawfully transfer Personal Information around the world, including the European Union Commission approved model contractual clauses.

In addition to such lawful data transfer mechanisms, 23andMe continues to participate in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union ("EU"), European Economic Area ("EEA"), and Switzerland to the United States, respectively. 23andMe remains committed to applying the Privacy Shield Framework's applicable Principles to Personal Information received from the EU, EEA and Switzerland. If there is any conflict between the terms in this Privacy Statement and applicable Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the U.S. [Department of Commerce's Privacy Shield List](https://web.archive.org/web/20220131232259/https://www.privacyshield.gov/list) (<https://web.archive.org/web/20220131232259/https://www.privacyshield.gov/list>).

23andMe is responsible for the processing of Personal Information it receives or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with applicable data protection law, including Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions in the Privacy Shield Principles.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have questions about our Privacy Shield certification, we encourage you to contact us privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>).

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your 23andMe Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiation of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your 23andMe Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. **Privacy Rights**

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andMe.com. (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>) We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your 23andMe Account Settings, and your Self-Reported Information by going to the surveys page, and other information as required by applicable law. You can download your raw Genetic Information within your 23andMe Account Settings or by going to the applicable tool in "Tools". If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. (Account Deletion), we allow you to delete your account at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request your Personal Information in a structured, commonly used and machine-readable format. You may also request the transfer of your Personal Information directly to another controller, where technically feasible, unless choosing to exercise this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you delete your account, we will take the steps described under "Your Choices – Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. **Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Alternatively, you may contact 23andMe's EU member representative, DataRep, at <https://www.datarep.com/23andme> (<https://web.archive.org/web/20220131232259/https://www.datarep.com/23andme>).

23andMe has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> (<https://web.archive.org/web/20220131232259/https://bbbprograms.org/privacy-shield-complaints/>) for more information and to file a complaint. This service is provided free of charge to you.

As a last resort and under limited circumstances, individuals from Designated Countries with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in the country of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20220131232259/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. California Residents

Pursuant to the California Consumer Privacy Act of 2018, California residents are afforded certain additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit our [Privacy Notice for California Residents](https://www.23andme.com/about/california-privacy/) (<https://web.archive.org/web/20220131232259/https://www.23andme.com/about/california-privacy/>).

11. Nevada Residents

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. 23andMe does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>).

12. Do Not Track Statement

Some browsers have a "do not track" feature that allows you to tell websites that you do not want to have your online activities tracked. At this time, due to a lack of industry standards, we do not respond to browser "do not track" signals. To learn more about interest-based advertising or to opt-out of this type of advertising, visit the [Network Advertising Initiative website](https://www.networkadvertising.org/choices) (<https://web.archive.org/web/20220131232259/https://www.networkadvertising.org/choices>) and the [Digital Advertising Alliance website](http://www.aboutads.info/choices) (<https://web.archive.org/web/20220131232259/http://www.aboutads.info/choices>). Options you select are browser- and device-specific.

13. Changes to this Privacy Statement

23andMe modifies this Privacy Statement from time to time. We recommend revisiting this page periodically to stay aware of any changes to this Privacy Statement. If we modify this Privacy Statement, we'll make it available through our website. Whenever material changes to this Privacy Statement are made, we will provide you with notice before the modifications are effective, such as by posting a notice on our website or sending a message to the email address associated with your account.

By continuing to access or use the Services after changes to this Privacy Statement becomes effective, you agree to be bound by the revised Privacy Statement. If any changes are unacceptable to you, you may stop using our Services and delete your account at any time.

We also may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

14. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20220131232259/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator

23andMe, Inc.

349 Oyster Point Blvd

South San Francisco, CA 94080

1.800.239.5230



[./web/20220131232259/https://www.23andme.com/](https://web.archive.org/web/20220131232259/https://www.23andme.com/)

SERVICES

[Health + Ancestry](https://web.archive.org/web/20220131232259/https://www.23andme.com/dna-health-ancestry/) ([./web/20220131232259/https://www.23andme.com/dna-health-ancestry/](https://web.archive.org/web/20220131232259/https://www.23andme.com/dna-health-ancestry/))

[Ancestry + Traits](https://web.archive.org/web/20220131232259/https://www.23andme.com/dna-ancestry/) ([./web/20220131232259/https://www.23andme.com/dna-ancestry/](https://web.archive.org/web/20220131232259/https://www.23andme.com/dna-ancestry/))

[23andMe+ Membership](https://web.archive.org/web/20220131232259/https://www.23andme.com/membership/) ([./web/20220131232259/https://www.23andme.com/membership/](https://web.archive.org/web/20220131232259/https://www.23andme.com/membership/))

[Gifts](https://web.archive.org/web/20220131232259/https://www.23andme.com/gifts/) ([./web/20220131232259/https://www.23andme.com/gifts/](https://web.archive.org/web/20220131232259/https://www.23andme.com/gifts/))

COMPANY

[Investors](https://web.archive.org/web/20220131232259/https://investors.23andme.com/) (<https://web.archive.org/web/20220131232259/https://investors.23andme.com/>)

[About Us](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/) ([./web/20220131232259/https://www.23andme.com/about/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/))

[Diversity, Equity & Inclusion](https://web.archive.org/web/20220131232259/https://www.23andme.com/diversity-equity-inclusion/) ([./web/20220131232259/https://www.23andme.com/diversity-equity-inclusion/](https://web.archive.org/web/20220131232259/https://www.23andme.com/diversity-equity-inclusion/))

[Media Center](https://web.archive.org/web/20220131232259/https://mediacenter.23andme.com/)

(<https://web.archive.org/web/20220131232259/https://mediacenter.23andme.com/>)

[Blog](https://web.archive.org/web/20220131232259/https://blog.23andme.com/) (<https://web.archive.org/web/20220131232259/https://blog.23andme.com/>)

[Topics](https://web.archive.org/web/20220131232259/https://www.23andme.com/topics/) ([./web/20220131232259/https://www.23andme.com/topics/](https://web.archive.org/web/20220131232259/https://www.23andme.com/topics/))

[Careers](https://web.archive.org/web/20220131232259/https://www.23andme.com/careers/) ([./web/20220131232259/https://www.23andme.com/careers/](https://web.archive.org/web/20220131232259/https://www.23andme.com/careers/))

[Refer a Friend](https://web.archive.org/web/20220131232259/https://refer.23andme.com/pub_for)

(https://web.archive.org/web/20220131232259/https://refer.23andme.com/pub_for)

[Return Policy](https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/us/articles/202907780/)

(<https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/us/articles/202907780/>)

[Customer Care](https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/us/)

(<https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/us/>)

[FSA/HSA Eligibility](https://web.archive.org/web/20220131232259/https://www.23andme.com/fsa-hsa/) ([./web/20220131232259/https://www.23andme.com/fsa-hsa/](https://web.archive.org/web/20220131232259/https://www.23andme.com/fsa-hsa/))

[Site Map](https://web.archive.org/web/20220131232259/https://www.23andme.com/sitemap/) ([./web/20220131232259/https://www.23andme.com/sitemap/](https://web.archive.org/web/20220131232259/https://www.23andme.com/sitemap/))

LEGAL

[Important Test Info](https://web.archive.org/web/20220131232259/https://www.23andme.com/test-info/) ([./web/20220131232259/https://www.23andme.com/test-info/](https://web.archive.org/web/20220131232259/https://www.23andme.com/test-info/))

[Terms of Service](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/) ([./web/20220131232259/https://www.23andme.com/about/tos/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/tos/))

[Privacy Statement](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/) ([./web/20220131232259/https://www.23andme.com/about/privacy/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/privacy/))

[Data Protection](https://web.archive.org/web/20220131232259/https://www.23andme.com/gdpr/) ([./web/20220131232259/https://www.23andme.com/gdpr/](https://web.archive.org/web/20220131232259/https://www.23andme.com/gdpr/))

[Family Considerations](https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/hc/en-us/articles/202907980/)

(<https://web.archive.org/web/20220131232259/https://customer.care.23andme.com/hc/en-us/articles/202907980/>)

[Research Consent](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/consent/) ([./web/20220131232259/https://www.23andme.com/about/consent/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/consent/))

[Individual Data Consent](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/individual-data-consent/) ([./web/20220131232259/https://www.23andme.com/about/individual-data-consent/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/individual-data-consent/))

[Biobanking Consent](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/biobanking/) ([./web/20220131232259/https://www.23andme.com/about/biobanking/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/biobanking/))

[Cookie Policy](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/) ([./web/20220131232259/https://www.23andme.com/about/cookies/](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/))

[Ad Choices](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options) ([./web/20220131232259/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options](https://web.archive.org/web/20220131232259/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options))

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(<https://web.archive.org/web/20220131232259/https://www.youtube.com/23andMe/>)



Exhibit 8

Privacy Highlights

Last Updated: December 9, 2021

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de identified Genetic Information and Self Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or others outside our Services, including through third party services that accept 23andMe data and social networks.
- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can consent to the use of your de identified data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared in the following ways:

- **With our service providers**, as necessary for them to provide their services to us.
- **With qualified research collaborators**, only if you provide your explicit consent.

23andMe will not sell, lease, or rent your individual level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any **public databases**.
- **We will not** provide any person's data (genetic or non-genetic) to an insurance company or employer.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](#)

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to, the following areas:

- **Independent security certification and audit.** Our information security management system, which protects 23andMe information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi factor authentication, single sign on, and a strict least privileged authorization policy.

Risks and Considerations

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.
- In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.

Full Privacy Statement

Last Updated: October 30, 2020

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including www.23andme.com (<https://web.archive.org/web/20220124204105/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/>). Unless otherwise defined in this Privacy Statement, terms used in this Privacy Statement have the same meanings as terms defined in our [Terms of Service](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service, you should immediately discontinue use of our Services.

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◦ ~~Information we share with commonly owned entities:~~

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, either through the Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - e. **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Inferences and Derived Data:** information, data, assumptions, or conclusions that are derived directly or indirectly from another source of Personal Information. For example, we may use statistical techniques to infer additional genetic information based on genetic information generated directly through the processing of your saliva sample.
 - g. **Web-Behavior Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., device information (device identifiers), IP address, browser type, domains, page views).

2. Information we collect

a. **Information you provide directly to us or through a third party**

- i. **Registration Information.** When you purchase our Services or create a 23andMe account, we collect Personal Information, which may include your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and

- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
 - iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Forums.
 - iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.
 - v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the third party social media service. Features are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.
 - vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
 - vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
 - viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20220124204105/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002) (<https://web.archive.org/web/20220124204105/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df90000002>).
 - ix. **Gifts.** If you provide us with Personal Information about others, if others give us your information, or if you authorize another individual to share or send your Personal Information to our third party service provider(s) for the purpose of ordering the Service or other personalized gift(s), we will only use that information for the purpose for which it was provided to us. These purposes may include, for example, where you provide us with a friend's shipping address when placing an order or where you authorize a family member to order personalized merchandise based on your ancestry report results. Once a gift recipient registers for our Services and agrees to our [Privacy Statement](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser. Information shared directly with our third party service provider(s) for personalized gifts are subject to such third party's terms of service and privacy policies.
 - x. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20220124204105/https://customercare.23andme.com/) (<https://web.archive.org/web/20220124204105/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.
- b. **Information related to our genetic testing services**

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to us or our third party laboratory. Your DNA will be extracted from your saliva sample for analysis. During kit registration you are asked to review our [Consent Document for Sample Storage and Additional Genetic Analyses](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage (“Biobanking”) and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to laboratory legal and regulatory requirements. You can update your Biobanking preference to discard a stored sample within your 23andMe Account Settings once your sample has completed processing.
 - ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.
- c. **Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**
- We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:
- i. help us recognize you when you use our Services;
 - ii. customize and improve your experience;
 - iii. provide security;
 - iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
 - v. gather demographic information about our user base;
 - vi. offer our Services to you;
 - vii. monitor the success of marketing programs; and
 - viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/), (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in Section 4.c).

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data here** (<https://web.archive.org/web/20220124204105/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://web.archive.org/web/20220124204105/https://www.google.com/settings/ads) (<https://web.archive.org/web/20220124204105/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20220124204105/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20220124204105/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and to analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area (“EEA”), United Kingdom, or Switzerland (collectively the “Designated Countries”): We process your Personal Information in this way to provide our Services to you in accordance with our [Terms of Service](https://web.archive.org/web/20220124204105/https://www.23andme.com/en-eu/about/tos/), (<https://web.archive.org/web/20220124204105/https://www.23andme.com/en-eu/about/tos/>).

b. **To process, analyze and deliver your genetic testing results**

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As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to be genotyped by us or our contracted laboratory. Once genotyped, we further analyze your Genetic Information to provide you with our health and/or ancestry reports, depending on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your 23andMe Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share Sensitive Information.

You should be thoughtful about your sharing choices. Once you have chosen to share any Personal Information, the individuals with whom you share this information, may also use or share your Personal Information, including any Sensitive Information you choose to share.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health ("NIH")) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the main Research Consent Document: (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/consent/>).

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent

(<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the main Research Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20220124204105/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in Section 5.d.).

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of our Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your 23andMe Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to us or to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to us or our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. For samples processed by our third party genotyping laboratory, when the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your 23andMe Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion), our genotyping laboratory or contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to our Service. Our IT and security service providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.

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v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): Where Personal Information are transferred to a third country or to an international organisation, 23andMe implements appropriate safeguards, such as contractual obligations, relating to the transfer.

b. "Targeted advertising" service providers

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

For more information about our marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/>).

c. Aggregate information

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20220124204105/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20220124204105/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your 23andMe Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

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You may access, correct or update most of your Registration Information on your own within your 23andMe Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the [surveys page](https://web.archive.org/web/20220124204105/https://you.23andme.com/research/all_questions_dashboard/) (https://web.archive.org/web/20220124204105/https://you.23andme.com/research/all_questions_dashboard/), by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your 23andMe Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at privacy@23andMe.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andMe.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your 23andMe Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to the following areas:

- **ISO/IEC 27001:2013 certification.** Our information security management system, which protects 23andMe systems, has been certified under the ISO/IEC 27001:2013 standard. View or download our certification [here](https://web.archive.org/web/20220124204105/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf). (https://web.archive.org/web/20220124204105/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf)
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. International Transfers

Your Personal Information will likely be transferred to, stored, and processed in the U.S. and other countries outside of where you live. When we conduct such transfers, we rely on various legal bases to lawfully transfer Personal Information around the world, including the European Union Commission approved model contractual clauses.

In addition to such lawful data transfer mechanisms, 23andMe continues to participate in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union ("EU"), European Economic Area ("EEA"), and Switzerland to the United States, respectively. 23andMe remains committed to applying the Privacy Shield Framework's applicable Principles to Personal Information received from the EU, EEA and Switzerland. If there is any conflict between the terms in this Privacy Statement and applicable Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the U.S. [Department of Commerce's Privacy Shield List](https://web.archive.org/web/20220124204105/https://www.privacyshield.gov/list) (<https://web.archive.org/web/20220124204105/https://www.privacyshield.gov/list>).

23andMe is responsible for the processing of Personal Information it receives or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with applicable data protection law, including Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions in the Privacy Shield Principles.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have questions about our Privacy Shield certification, we encourage you to contact us privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>).

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your 23andMe Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiation of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your 23andMe Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. **Privacy Rights**

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andme.com. (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>) We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your 23andMe Account Settings, and your Self-Reported Information by going to the surveys page, and other information as required by applicable law. You can download your raw Genetic Information within your 23andMe Account Settings or by going to the applicable tool in "Tools". If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. (Account Deletion), we allow you to delete your account at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request your Personal Information in a structured, commonly used and machine-readable format. You may also request the transfer of your Personal Information directly to another controller, where technically feasible, unless choosing to exercise this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you delete your account, we will take the steps described under "Your Choices – Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. **Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Privacy Officer
23andMe, Inc.,
349 Oyster Point Blvd,
South San Francisco, CA 94080
1.800.239.5230,

privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>)

Alternatively, you may contact 23andMe's EU member representative, DataRep, at <https://www.datarep.com/23andme?dpr> (<https://web.archive.org/web/20220124204105/https://www.datarep.com/23andme?dpr>).

23andMe's commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20220124204105/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and/or to file a complaint.

As a last resort and under limited circumstances, individuals from Designated Countries with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in the country of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20220124204105/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. California Residents

Pursuant to the California Consumer Privacy Act of 2018, California residents are afforded certain additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit our [Privacy Notice for California Residents](#) (<https://web.archive.org/web/20220124204105/https://www.23andme.com/about/california-privacy/>).

11. Nevada Residents

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. 23andMe does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>).

12. Do Not Track Statement

Some browsers have a "do not track" feature that allows you to tell websites that you do not want to have your online activities tracked. At this time, due to a lack of industry standards, we do not respond to browser "do not track" signals. To learn more about interest-based advertising or to opt-out of this type of advertising, visit the [Network Advertising Initiative website](#) (<https://web.archive.org/web/20220124204105/https://www.networkadvertising.org/choices>) and the [Digital Advertising Alliance website](#) (<https://web.archive.org/web/20220124204105/http://www.aboutads.info/choices>). Options you select are browser- and device-specific.

13. Changes to this Privacy Statement

23andMe modifies this Privacy Statement from time to time. We recommend revisiting this page periodically to stay aware of any changes to this Privacy Statement. If we modify this Privacy Statement, we'll make it available through our website. Whenever material changes to this Privacy Statement are made, we will provide you with notice before the modifications are effective, such as by posting a notice on our website or sending a message to the email address associated with your account.

By continuing to access or use the Services after changes to this Privacy Statement becomes effective, you agree to be bound by the revised Privacy Statement. If any changes are unacceptable to you, you may stop using our Services and delete your account at any time.

We also may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

14. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20220124204105/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Point Blvd
South San Francisco, CA 94080
1.800.239.5230



[./web/20220124204105/https://www.23andme.com/](https://www.23andme.com/)

SERVICES

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[Ancestry + Traits](https://www.23andme.com/dna-ancestry/) ([./web/20220124204105/https://www.23andme.com/dna-ancestry/](https://web.archive.org/web/20220124204105/https://www.23andme.com/dna-ancestry/))

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[Family Considerations](https://www.23andme.com/hc/en-us/articles/202907980)

(<https://web.archive.org/web/20220124204105/https://customer.23andme.com/hc/en-us/articles/202907980>)

[Research Consent](https://www.23andme.com/about/consent/) ([./web/20220124204105/https://www.23andme.com/about/consent/](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/consent/))

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[Biobanking Consent](https://www.23andme.com/about/biobanking/) ([./web/20220124204105/https://www.23andme.com/about/biobanking/](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/biobanking/))

[Cookie Policy](https://www.23andme.com/about/cookies/) ([./web/20220124204105/https://www.23andme.com/about/cookies/](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/))

[Ad Choices](https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options) ([./web/20220124204105/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options](https://web.archive.org/web/20220124204105/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options))

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COMPANY

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[Blog](https://blog.23andme.com/) (<https://web.archive.org/web/20220124204105/https://blog.23andme.com/>)

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(<https://web.archive.org/web/20220124204105/https://refer.23andme.com/pub.fr>)

[Return Policy](https://www.23andme.com/customer-care/)

(<https://web.archive.org/web/20220124204105/https://customer.23andme.com/us/articles/202907780>)

[Customer Care](https://www.23andme.com/fsa-hsa/)

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PARTNER WITH US

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(<https://web.archive.org/web/20220124204105/https://medical.23andme.com/>)

[Educators](https://www.23andme.com/education/)

(<https://web.archive.org/web/20220124204105/https://education.23andme.com/>)

[Scientists](https://www.23andme.com/research/) (<https://web.archive.org/web/20220124204105/https://research.23andme.com/>)

[Therapeutics](https://www.23andme.com/therapeutics/)

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(<https://web.archive.org/web/20190911154730/https://www.elsevier.com/locate/jmb>)



Exhibit 9

Privacy Highlights

Effective Date: January 1, 2020

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](#) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:


- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de identified Genetic Information and Self Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or others outside our Services, including through third party services that accept 23andMe data and social networks.
- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can consent to the use of your de identified data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

 [23andMe \(/web/20201030011505/https://www.23andme.com/Shop \(/web/20201030011505/https://www.23andme.com/compare-dna-tests/\)\)](https://web/20201030011505/https://www.23andme.com/Shop (/web/20201030011505/https://www.23andme.com/compare-dna-tests/))

Your Personal Information may be shared in the following ways:

- **With our service providers**, as necessary for them to provide their services to us.
- **With qualified research collaborators**, only if you provide your explicit consent.

23andMe will not sell, lease, or rent your individual level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any **public databases**.
- **We will not** provide any person's data (genetic or non genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](#)

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to, the following areas:

- **Independent security certification and audit.** Our information security management system, which protects 23andMe information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi factor authentication, single sign on, and a strict least privileged authorization policy.

Risks and Considerations

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.
- In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.

Full Privacy Statement

Effective Date: January 1, 2020

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including www.23andme.com (<https://web.archive.org/web/20201030011505/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/>). Unless otherwise defined in this Privacy Statement, terms used in this Privacy Statement have the same meanings as terms defined in our [Terms of Service](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service, you should immediately discontinue use of our Services.

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, either through the Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - e. **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Inferences and Derived Data:** information, data, assumptions, or conclusions that are derived directly or indirectly from another source of Personal Information. For example, we may use statistical techniques to infer additional genetic information based on genetic information generated directly through the processing of your saliva sample.
 - g. **Web-Behavior Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., device information (device identifiers), IP address, browser type, domains, page views).

2. Information we collect

- a. **Information you provide directly to us or through a third party**

- i. **Registration Information.** When you purchase our Services or create a 23andMe account, we collect Personal Information which may include your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Forums.
- iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.
- v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the third party social media service. Features are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.
- vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
- vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
- viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20201030011505/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20201030011505/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- ix. **Gifts.** If you provide us with Personal Information about others, if others give us your information, or if you authorize another individual to share or send your Personal Information to our third party service provider(s) for the purpose of ordering the Service or other personalized gift(s), we will only use that information for the purpose for which it was provided to us. These purposes may include, for example, where you provide us with a friend's shipping address when placing an order or where you authorize a family member to order personalized merchandise based on your ancestry report results. Once a gift recipient registers for our Services and agrees to our [Privacy Statement](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser. Information shared directly with our third party service provider(s) for personalized gifts are subject to such third party's terms of service and privacy policies.
- x. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20201030011505/https://customercare.23andme.com/) (<https://web.archive.org/web/20201030011505/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/privacy/>),

b. Information related to our genetic testing services

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to us or our third party laboratory. Your DNA will be extracted from your saliva sample for analysis. During kit registration you are asked to review our [Consent Document for Sample Storage and Additional Genetic Analyses](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/biobanking/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage ("Biobanking") and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to laboratory legal and regulatory requirements. You can update your Biobanking preference to discard a stored sample within your 23andMe Account Settings once your sample has completed processing.
- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.

c. Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- i. help us recognize you when you use our Services;
- ii. customize and improve your experience;
- iii. provide security;
- iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- v. gather demographic information about our user base;
- vi. offer our Services to you;
- vii. monitor the success of marketing programs; and
- viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](https://web.archive.org/web/20201030011505/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in Section 4.c).

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](https://web.archive.org/web/20201030011505/https://policies.google.com/technologies/partner-sites)** (<https://web.archive.org/web/20201030011505/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://web.archive.org/web/20201030011505/https://www.google.com/settings/ads) (<https://web.archive.org/web/20201030011505/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20201030011505/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20201030011505/https://tools.google.com/dlpage/gaoptout>).

d. Other Types of Information

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. To provide you with Services and to analyze and improve our Services

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

b. To process, analyze and deliver your genetic testing results

As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to be genotyped by us or our contracted laboratory. Once genotyped, we further analyze your Genetic Information to provide you with our health and/or ancestry reports, depending on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your 23andMe Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share Sensitive Information.

You should be thoughtful about your sharing choices. Once you have chosen to share any Personal Information, the individuals with whom you share this information, may also use or share your Personal Information, including any Sensitive Information you choose to share.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health ("NIH")) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level [Genetic Information](#) and [Self-Reported Information](#) as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the main Research [Consent Document](#):
(<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/consent/>)

- i. Your [Genetic Information](#) and/or [Self-Reported Information](#) will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level [Genetic Information](#) and [Self-Reported Information](#) internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the [Individual Level Data Sharing Consent](#)

(<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the main Research Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20201030011505/mailto:hpa@23andme.com>). 23andMe will not include your [Genetic Information](#) or [Self-Reported Information](#) in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in Section 5.d.).

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Research is an important aspect of our Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially fit the relevant eligibility criteria to make them aware of the research project and provide a link to participate with the research organization conducting the study. We will not share Individual-level Genetic Information or Self-Reported Information with any third party without your explicit consent. If you do not wish to receive these notifications, you can manage them by editing your preferences in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your 23andMe Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to us or to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to us or our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. For samples processed by our third party genotyping laboratory, when the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your 23andMe Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion), our genotyping laboratory or contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to our Service. Our IT and security service providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.

v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): Where personal data are transferred to a third country or to an international organisation, 23andMe implements appropriate safeguards, such as contractual obligations, relating to the transfer.

b. **"Targeted advertising" service providers**

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

For more information about our marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/cookies/>).

c. **Aggregate information**

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. **Information we share with commonly owned entities**

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. **As required by law**

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20201030011505/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20201030011505/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. **Business transactions**

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your 23andMe Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your 23andMe Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page (https://web.archive.org/web/20201030011505/https://you.23andme.com/research/all_questions_dashboard/), by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your 23andMe Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your 23andMe Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These

- **ISO/IEC 27001:2013 certification.** Our information security management system, which protects 23andMe systems, has been certified under the ISO/IEC 27001:2013 standard. View or download our certification [here](https://web.archive.org/web/20201030011505/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf). (https://web.archive.org/web/20201030011505/https://permalinks.23andme.com/pdf/23andMe_ISO_27001_Certificate.pdf)
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union (EU), European Economic Area (EEA), and Switzerland to the United States, respectively. 23andMe is committed to subjecting all Personal Information received from the EU member countries, EEA and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [U.S. Department of Commerce's Privacy Shield List](https://web.archive.org/web/20201030011505/https://www.privacyshield.gov/list). (<https://web.archive.org/web/20201030011505/https://www.privacyshield.gov/list>)

23andMe is responsible for the processing of Personal Information it receives, under the Privacy Shield Frameworks, or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your 23andMe Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiation of a sale to you.

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We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your 23andMe Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests of 23andMe. E.g., where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. Privacy Rights

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>). We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your 23andMe Account Settings, and your Self-Reported Information by going to the surveys page, and other information as required by applicable law. You can download your raw Genetic Information within your 23andMe Account Settings or by going to the applicable tool in "Tools". If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. (Account Deletion), we allow you to delete your account at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request your Personal Information in a structured, commonly used and machine-readable format. You may also request the transfer of your Personal Information directly to another controller, where technically feasible, unless choosing to exercise this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you delete your account, we will take the steps described under "Your Choices - Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;

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- prejudice security, grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management, or
 - otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. Complaints

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Privacy Officer
23andMe, Inc.,
223 N. Mathilda Avenue,
Sunnyvale, CA 94086
1.800.239.5230,
privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>)

Alternatively, you may contact 23andMe's EU member representative, DPR Group, at <https://www.dpr.eu.com/23andme> (<https://web.archive.org/web/20201030011505/https://www.dpr.eu.com/23andme>).

23andMe's commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20201030011505/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and/or to file a complaint.

As a last resort and under limited circumstances, EU, EEA and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here:

https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20201030011505/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. California Residents

Pursuant to the California Consumer Privacy Act of 2018, California residents are afforded certain additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit our [Privacy Notice for California Residents](#) (<https://web.archive.org/web/20201030011505/https://www.23andme.com/about/california-privacy/>).

11. Nevada Residents

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. 23andMe does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at privacy@23andme.com. (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>).

12. Do Not Track Statement

Some browsers have a "do not track" feature that allows you to tell websites that you do not want to have your online activities tracked. At this time, due to a lack of industry standards, we do not respond to browser "do not track" signals. To learn more about interest-based advertising or to opt-out of this type of advertising, visit the [Network Advertising Initiative website](#) (<https://web.archive.org/web/20201030011505/https://www.networkadvertising.org/choices>) and the [Digital Advertising Alliance website](#) (<https://web.archive.org/web/20201030011505/http://www.aboutads.info/choices>). Options you select are browser- and device-specific.

13. Changes to this Privacy Statement

23andMe modifies this Privacy Statement from time to time. We recommend revisiting this page periodically to stay aware of any changes to this Privacy Statement. If we modify this Privacy Statement, we'll make it available through our website. Whenever material changes to this Privacy Statement are made, we will provide you with notice before the modifications are effective, such as by posting a notice on our website or sending a message to the email address associated with your account.

By continuing to access or use the Services after changes to this Privacy Statement becomes effective, you agree to be bound by the revised Privacy Statement. If any changes are unacceptable to you, you may stop using our Services and delete your account at any time.

We also may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

14. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20201030011505/mailto:privacy@23andme.com>), or send a letter to:

[Read the previous version of the document. \(?version=6.0\)](#)

Exhibit 10

Privacy Highlights

Last Updated: September 30, 2019.

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web-Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](#) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self-Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de-identified Genetic Information and Self-Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt-in to view.

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- When you share your information, including with family members, professionals, or others outside our Services, including through third party services that accept 23andMe data and social networks.
 - To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can consent to the use of your de-identified data for scientific research purposes.
 - To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared in the following ways:

- **With our service providers**, including our contracted genotyping laboratory, as necessary for them to provide their services to us.
- **With qualified research collaborators**, only if you provide your explicit consent.

23andMe will not sell, lease, or rent your individual-level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any **public databases**.
- **We will not** provide any person's data (genetic or non-genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](https://web.archive.org/web/20191216212256/https://www.23andme.com/transparency-report/) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/transparency-report/>)).

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to, the following areas:

- **Independent security certification and audit.** Our information security management system, which protects 23andMe information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.

Risks and Considerations

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.

Full Privacy Statement

Last Updated: September 30, 2019

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including [www.23andme.com](https://web.archive.org/web/20191216212256/https://www.23andme.com/) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/>). Unless otherwise defined in this Privacy Statement, terms used in this Privacy Statement have the same meanings as terms defined in our [Terms of Service](https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service, you should immediately discontinue use of our Services.

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.

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- c. **Self-Reported Information:** information you provide directly to us, either through our Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - e. **User Content:** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information - generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Web-Behavior Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., browser type, domains, page views).

2. Information we collect

a. Information you provide directly to us or through a third party

- i. **Registration Information.** When you purchase our Services or create a 23andMe account, we collect Personal Information, which may include your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Forums.
- iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.
- v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP

function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the third party social media service. Features are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.

- vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
- vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
- viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20191216212256/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20191216212256/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- ix. **Gifts.** If you provide us with Personal Information about others, or if others give us your information, for the purpose of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for our Services and agrees to our [Privacy Statement](#) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/privacy/>), our [Terms of Service](#) (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](#)

(<https://web.archive.org/web/20191216212256/http://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser.

- x. **Customer service.** When you contact Customer Care (<https://web.archive.org/web/20191216212256/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/>), Privacy Statement (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.

b. **Information related to our genetic testing services**

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to our third party laboratory. Our laboratory will extract your DNA from your saliva sample for analysis. During kit registration you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage ("Biobanking") and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. You can update your sample storage preference to discard a stored sample within your 23andMe Account Settings once your sample has completed processing.
- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.

c. **Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- i. help us recognize you when you use our Services;
- ii. customize and improve your experience;
- iii. provide security;
- iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- v. gather demographic information about our user base;
- vi. offer our Services to you;
- vii. monitor the success of marketing programs; and
- viii. serve targeted advertising on our site and on other sites around the Internet.

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If you reject cookies, you may still use our site but your ability to use some of our site's features may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](#).

(<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in section 4.c).

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](#)**

(<https://web.archive.org/web/20191216212256/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](#)

(<https://web.archive.org/web/20191216212256/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](#)

(<https://web.archive.org/web/20191216212256/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and to analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

b. To process, analyze and deliver your genetic testing results

As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to our contracted genotyping laboratory, which processes and analyzes your sample to provide us with your raw Genetic Information. Once we receive your raw Genetic Information from the laboratory, we further analyze it to provide you with our health and/or ancestry reports, dependent on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your 23andMe Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share Sensitive Information.

You should be thoughtful about your sharing choices. Once you have chosen to share any Personal Information, the individuals with whom you share this information, may also use or share your Personal Information, including any Sensitive Information you choose to share.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose,

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predict or from medical or other health conditions, work with public/private entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the main Research Consent Document:

(<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/consent/>)

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent

(<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the main Research Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20191216212256/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in section 5.d).

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of our Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially fit the relevant eligibility criteria to make them aware of the research project and provide a link to participate with the

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research organization conducting the study. We will not share or disclose your Personal Information or Self-Reported Information with any third party without your explicit consent. If you do not wish to receive these notifications, you can manage them by editing your preferences in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your 23andMe Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your 23andMe Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

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We share information described above in Section 2 with our third party service providers necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. When the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your 23andMe Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion), our contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to our Service. Our IT and security service providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.
- v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

b. "Targeted advertising" service providers

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

For more information about our marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/cookies/>).

c. Aggregate information

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court

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order, or government inquiry or litigation that 23andMe may be subject to, which includes professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20191216212256/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20191216212256/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20191216212256/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. **Business transactions**

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. **Access to your account**

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your 23andMe Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your 23andMe Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page (https://web.archive.org/web/20191216212256/https://you.23andme.com/research/all_questions_dashboard) by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. **Marketing communications**

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your 23andMe Account Settings,

You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your 23andMe Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and/or our contracted genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to the following areas:

- **ISO/IEC 27001:2013 certification.** Our information security management system, which protects 23andMe systems, has been certified under the ISO/IEC 27001:2013 standard. View or download our certification [here](https://web.archive.org/web/20191216212256/https://permalinks.23andme.com/pdf/23andMe_ISO_27001).
(https://web.archive.org/web/20191216212256/https://permalinks.23andme.com/pdf/23andMe_ISO_27001)
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union (EU), European Economic Area (EEA), and Switzerland to the United States, respectively. 23andMe is committed to subjecting all Personal Information received from the EU member countries, EEA and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [U.S. Department of Commerce's Privacy Shield List](https://www.privacyshield.gov/list).

(<https://web.archive.org/web/20191216212256/https://www.privacyshield.gov/list>)

23andMe is responsible for the processing of Personal Information it receives, under the Privacy Shield Frameworks, or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your 23andMe Account Settings or by emailing privacy@23andme.com

(<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiation of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your 23andMe Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>). You may raise such

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obtained with regard to initial or further processing for purposes of direct marketing, and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests of 23andMe. E.g., where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. **Privacy Rights**

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andMe.com. (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>) We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your 23andMe Account Settings, and your Self-Reported Information by going to the surveys page. You can download your raw Genetic Information within your 23andMe Account Settings or by going to the applicable tool in "Tools." If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. (Account Deletion), we allow our customers to delete their accounts at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request your Personal Information in a structured, commonly used and machine-readable format. You may also request the transfer of your Personal Information directly to another controller, where technically feasible, unless choosing to exercise this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you

23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.

- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you delete your account, we will take the steps described under "Your Choices - Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. **Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Privacy Officer
23andMe, Inc.,
223 N. Mathilda Avenue,

Alternatively, you may contact 23andMe's EU member representative, DPR Group, at <https://www.dpr.eu.com/23andme> (<https://web.archive.org/web/20191216212256/https://www.dpr.eu.com/23andme>).

23andMe's commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20191216212256/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and/or to file a complaint.

As a last resort and under limited circumstances, EU, EEA and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20191216212256/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. Nevada Residents

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. 23andMe does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at privacy@23andme.com. (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>).

11. Changes to this Privacy Statement

23andMe modifies this Privacy Statement from time to time. We recommend revisiting this page periodically to stay aware of any changes to this Privacy Statement. If we modify this Privacy Statement, we'll make it available through our website. Whenever material changes to this Privacy Statement are made, we will provide you with notice before the modifications are effective, such as by posting a notice on our website or sending a message to the email address associated with your account.

By continuing to access or use the Services after changes to this Privacy Statement becomes effective, you agree to be bound by the revised Privacy Statement. If any changes are unacceptable to you, you may stop using our Services and delete your account at any time.

We also may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

12. Contact Information

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If you have questions about this Privacy Statement, or wish to submit a comment or request, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20191216212256/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator
23andMe, Inc.
223 N. Mathilda Avenue
Sunnyvale, CA 94086
1.800.239.5230

[Read the previous version of the document. \(?version=5.3\)](#)

Exhibit 11

Privacy Highlights

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web-Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](#) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/cookies/>) for more information.
- **Information you share directly with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self-Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de-identified Genetic Information and Self-Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

23andMe gives you the ability to share information in a variety of ways. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt-in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or other individuals outside our Services, including through third party services that accept

- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can give consent for the use of your data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared information in the following ways:

- **With our service providers**, including our genotyping laboratory, as necessary for them to provide their services to us.
- **With research collaborators**, only if you have given your explicit consent.

23andMe will not sell, lease, or rent your individual-level information to any third party or to a third party for research purposes without your explicit consent.

- **We do not** share customer data with any **public databases**.
- **We will not** provide any person's data (genetic or non-genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](https://web.archive.org/web/20190922165559/https://www.23andme.com/transparency-report/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/transparency-report/>)).

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data.

- **De-identification/Pseudonymization, encryption, and data segmentation.** Registration Information is stripped from Sensitive Information, including genetic and phenotypic data. This data is then assigned a random ID so the person who provided the data cannot reasonably be identified. 23andMe uses industry standard security measures to encrypt sensitive personal data both when it is stored (data-at-rest) and when it is being transmitted (data-in-flight). Additionally, data are segmented across logical database systems to further prevent re-identifiability.
- **Limiting access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our build pipeline and regularly engage third party security experts to conduct penetration tests.

Risks and Considerations

There may be some consequences of using 23andMe Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.

Full Privacy Statement

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including [www.23andme.com](https://web.archive.org/web/20190922165559/https://www.23andme.com/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service you should immediately discontinue use of our Services.

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.

e. **User Content.** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.

f. **Web-Behavior Information:** information on how you use 23andMe Services collected through log files, cookies, web beacons, and similar technologies, (e.g., browser type, domains, page views).

2. Information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you purchase our Services or create a 23andMe account and register your kit, we collect Personal Information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on 23andMe's Forums.
- iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's privacy statement.
- v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third-party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third-party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if

- connecting them to our website or Service.
- vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
- vii. **Third party sign in.** You may create a 23andMe account and/or sign in to our Services using an account you created with a third party service, such as Google. If you provide authorization to 23andMe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. 23andMe does not have access to the credentials for your third party service account. If you choose to use third party sign in and you lose access to your credentials for your third party service account, you may not be able to access your 23andMe account. You may manage authorization for third party sign in through your 23andMe Account Settings or through your third party service account.
- viii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20190922165559/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20190922165559/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- ix. **Gifts.** If you provide us with Personal Information about others, or if others give us your information, for the purpose of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our [Privacy Statement](https://web.archive.org/web/20190922165559/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20190922165559/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser.
- x. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20190922165559/https://customercare.23andme.com/) (<https://web.archive.org/web/20190922165559/https://customercare.23andme.com/>) or

investigate any breach of our Terms of Service

(<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/>), Privacy Statement

(<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.

b. Information related to our genetic testing services

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to our third party laboratory. Our laboratory will extract your DNA from your saliva sample for analysis. During kit registration you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/biobanking/>). Unless you consent to sample storage ("Biobanking") and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. You can update your sample storage preference to discard a stored sample within your Account Settings once your sample has completed processing.
- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.

c. Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- i. help us recognize you when you use our Services;
- ii. customize and improve your experience;
- iii. provide security;
- iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- v. gather demographic information about our user base;
- vi. offer our Services to you;
- vii. monitor the success of marketing programs; and
- viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our Cookie Policy.

(<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/cookies/>)

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We may also use information based on these cookies for third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in section 4.c). We and our third party service providers do not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted advertising.

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](https://web.archive.org/web/20190922165559/https://policies.google.com/technologies/partner-sites)** (<https://web.archive.org/web/20190922165559/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use Google Ad Settings (<https://web.archive.org/web/20190922165559/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use this link (<https://web.archive.org/web/20190922165559/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): We process your Personal Information in this way to provide our Services to you in accordance with our Terms of Service.

b. **To process, analyze and deliver your genetic testing results**

As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to our contracted genotyping laboratory, which processes and analyzes your sample to provide us with your raw Genetic Information. Once we receive your raw Genetic Information from the laboratory, we further analyze it to provide you with our health and/or ancestry reports, dependent on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purposes described above is based on your consent. You may withdraw your consent at any time by deleting your Account via your Account Settings, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

c. **To allow you to share your Personal Information with others**

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share sensitive data.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. **To allow you to share your Personal Information for 23andMe Research purposes**

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the Main Research Consent Document:

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- i. Your Genetic Information and Self-Reported Information will be used for research purposes but it will be de-identified and will not be linked to your Registration Information.
 - ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
 - iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the Main Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20190922165559/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in section 5.d).

What happens if you do NOT consent to 23andMe Research? If you choose not to complete a Consent Document or any additional agreement with 23andMe, your Personal Information will not be used for 23andMe Research. However, your Genetic Information and Self Reported Information may still be used by us and shared with our third party service providers to as outlined in this Privacy Statement.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of 23andMe's Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. However we will not share Individual-level Genetic Information or Self-Reported Information with any third party without your consent. If you do not wish to receive these notifications, you can manage them by editing your preferences in your Account Settings.

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For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You may also opt-in to receiving similar notifications on the website or mobile application(s). You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your Account Settings to edit your email notification preferences. To opt-out of receiving website and mobile notifications, you may do so within your browser or device settings. Please note, the opt-out process differs between web browsers and mobile devices. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve

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our Services. While 23andMe directly controls the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. When the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion) our contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to the Service. Our IT and security providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.
- v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

We permit third party advertising networks and providers to collect Web-Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. For more information about our marketing practices, please review our Cookie Policy.
(<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/cookies/>).

c. Aggregate information

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20190922165559/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20190922165559/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page (https://web.archive.org/web/20190922165559/https://you.23andme.com/research/all_questions_dashboard) by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account or when using 23andMe Services. You may view or update your notification preferences for marketing communications by visiting your Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at privacy@23andMe.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andMe.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you to confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and our third party genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA) and CA Business and Professional Code Section 1265 and CAP accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, and record of legal agreements for a limited period of time as required by contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information.

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- **23andMe produces secure applications by design.** 23andMe incorporates explicit security reviews in the software development lifecycle, quality assurance testing and operational deployment.
 - **De-identification/Pseudonymization.** Registration Information is stripped from Sensitive Information, including Genetic and Self-Reported Information. This data is then assigned a randomly generated ID so an individual cannot reasonably be identified.
 - **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
 - **Separation of Environments.** 23andMe ensures processing, production, and research environments are separated and access is restricted. Data, including Registration Information, Genetic Information, and Self-Reported Information are segmented across logical database systems to further prevent re-identifiability.
 - **Limiting access to essential personnel.** We limit access to Personal Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.
 - **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our processes and regularly engage third party security experts to conduct penetration tests.
 - **Incident Management.** 23andMe maintains a formal incident management program designed to ensure the secure, continuous delivery of its Services. 23andMe has implemented an incident management program using industry best practices, including guidance from the National Institute of Standards and Technology (NIST).
 - **Managing third party service providers.** 23andMe requires service providers to implement and maintain accepted industry standard administrative, physical and technical safeguards to protect Personal Information.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union (EU), European Economic Area (EEA), and Switzerland to the United States, respectively. 23andMe is committed to subjecting all Personal Information received from the EU member countries, EEA and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [U.S. Department of Commerce's Privacy Shield List](https://web.archive.org/web/20190922165559/https://www.privacyshield.gov/list).
(<https://web.archive.org/web/20190922165559/https://www.privacyshield.gov/list>)

23andMe is responsible for the processing of Personal Information it receives, under the Privacy Shield Frameworks, or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

b. Our relationship with you

We are the "controller" with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

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We will only contact you for consent where needed to send you targeted communications using electronic means. You may withdraw your consent at any time within your Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests of 23andMe. E.g., where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. **Privacy Rights**

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andme.com. (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>) We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your Account Settings, and your Self-Reported Information by going to the surveys page. You can download your raw Genetic Information within your Account Settings or by going to the applicable tool in "Tools." If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. ("Account Deletion"), we allow our customers to delete their accounts at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.

- iv. **Right to data portability.** If we process your Personal Information based on a contract with you based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have us transfer your Personal Information directly to another controller, where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A “controller” is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe’s legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you make a request for us to delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you request to delete your account, we will take the steps described under “Your Choices – Account Deletion” and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or

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the 25% of the interests of others or where the bulk of the cost of providing services would be disproportionate.

f. **Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Global Privacy Officer, 23andMe, Inc.,

899 West Evelyn Avenue,

Mountain View, CA 94041

1.800.239.5230,

privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>)

Alternatively, you may contact 23andMe's EU member representative, DPR Group, at

<https://www.dpr.eu.com/23andme>

(<https://web.archive.org/web/20190922165559/https://www.dpr.eu.com/23andme>).

23andMe's commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20190922165559/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and/or to file a complaint.

As a last resort and under limited circumstances, EU, EEA and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20190922165559/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our website for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective. 23andMe may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify 23andMe's privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

11. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20190922165559/mailto:privacy@23andme.com>), or send a letter to:

899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on August 22, 2019.**

[Read the previous version of the document. \(?version=5.2\)](#)

Exhibit 12

Privacy Highlights

These "Privacy Highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services.** We collect Web-Behavior Information via cookies and other similar tracking technologies when you use and access our Services (our website, mobile apps, products, software and other services). See our [Cookie Policy](#) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/cookies>) for more information.
- **Information you share directly with us.** We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self-Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, we extract your DNA from your saliva sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with 23andMe reports.

How We Use Information

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing saliva samples and DNA, and delivering results and powering tools like DNA Relatives.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze use of our website to improve the customer experience or assess our marketing campaigns.
- **For 23andMe Research, with your consent.** If you choose to consent to participate in 23andMe Research, 23andMe researchers can include your de-identified Genetic Information and Self-Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

23andMe gives you the ability to share information in a variety of ways. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you view and/or opt-in to view.
- When and with whom **you share your information**, including friends, family members, health care professionals, or other individuals outside our Services, including through third party services that accept

- To give or decline consent for 23andMe Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Research Community you can give consent for the use of your data for scientific research purposes.
- To delete your 23andMe account and data, at any time.

Access To Your Information

Your Personal Information may be shared information in the following ways:

- **With our service providers**, including our genotyping laboratory, as necessary for them to provide their services to us.
- **With research collaborators**, only if you have given your explicit consent.

23andMe will not sell, lease, or rent your individual-level information to any third party or to a third party for research purposes without your explicit consent.

- **We do not** share customer data with any **public databases**.
- **We will not** provide any person's data (genetic or non-genetic) to an **insurance company** or **employer**.
- **We will not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](https://web.archive.org/web/20180820183119/https://www.23andme.com/transparency-report/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/transparency-report/>)).

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data.

- **De-identification/Pseudonymization, encryption, and data segmentation.** Registration Information is stripped from Sensitive Information, including genetic and phenotypic data. This data is then assigned a random ID so the person who provided the data cannot reasonably be identified. 23andMe uses industry standard security measures to encrypt sensitive personal data both when it is stored (data-at-rest) and when it is being transmitted (data-in-flight). Additionally, data are segmented across logical database systems to further prevent re-identifiability.
- **Limiting access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our build pipeline and regularly engage third party security experts to conduct penetration tests.

Risks and Considerations

There may be some consequences of using 23andMe Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.

Full Privacy Statement

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including [www.23andme.com](https://web.archive.org/web/20180820183119/https://www.23andme.com/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate, and to your use of the 23andMe mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our [Terms of Service](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service you should immediately discontinue use of our Services.

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.

e. **User Content.** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.

f. **Web-Behavior Information:** information on how you use 23andMe Services collected through log files, cookies, web beacons, and similar technologies, (e.g., browser type, domains, page views).

2. Information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you purchase our Services or create a 23andMe account and register your kit, we collect Personal Information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on 23andMe's Forums.
- iv. **Blogs and Forums.** Our website offers publicly accessible blogs. Additionally, 23andMe customers may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's privacy statement.
- v. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third-party social media services to provide us information about you, including your name, email address, and other contact information. The information we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third-party or hosted directly on our site. Your interactions with these Features are governed by the privacy statements of the third party companies providing them. You should always review and, if

- connecting them to our website or Service.
- vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
- vii. **Referral information and sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20180820183119/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20180820183119/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- viii. **Gifts.** If you provide us with Personal Information about others, or if others give us your information, for the purpose of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our [Privacy Statement](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/consent/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/consent/>), his or her Personal Information will be used in manners consistent with this Privacy Statement, and will not be shared with the purchaser, unless they independently choose to share their own Personal Information through the Services with the purchaser.
- ix. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20180820183119/https://customercare.23andme.com/) (<https://web.archive.org/web/20180820183119/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/privacy/>) or applicable laws or regulations; and analyze and improve our Services.
- b. **Information related to our genetic testing services**
- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit,

and use your saliva sample to send third party laboratory our DNA for analysis. During kit registration you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses

(<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/biobanking/>).

Unless you consent to sample storage ("Biobanking") and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. You can update your sample storage preference to discard a stored sample within your Account Settings once your sample has completed processing.

- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 3 below.

c. **Web-Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- i. help us recognize you when you use our Services;
- ii. customize and improve your experience;
- iii. provide security;
- iv. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- v. gather demographic information about our user base;
- vi. offer our Services to you;
- vii. monitor the success of marketing programs; and
- viii. serve targeted advertising on our site and on other sites around the Internet.

If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our Cookie Policy.

(<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/cookies/>).

We may receive reports based on the use of these technologies from third party service providers as de-identified, Individual-level Information or as Aggregate Information (as described in section 4.c). We and our third party service providers do not use your Sensitive Information, such as Genetic Information and Self-Reported Information, for targeted advertising.

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](#)**

(<https://web.archive.org/web/20180820183119/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://www.google.com/settings/ads) (<https://web.archive.org/web/20180820183119/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20180820183119/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20180820183119/https://tools.google.com/dlpage/gaoptout>).

d. **Other Types of Information**

We continuously work to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. **To provide you with Services and analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): We process your Personal Information in this way to provide our Services to you in accordance with our [Terms of Service](https://web.archive.org/web/20180820183119/https://www.23andme.com/en-eu/about/tos/). (<https://web.archive.org/web/20180820183119/https://www.23andme.com/en-eu/about/tos/>)

b. **To process, analyze and deliver your genetic testing results**

As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to our contracted genotyping laboratory, which processes and analyzes your sample to provide us with your raw Genetic Information. Once we receive your raw Genetic Information from the laboratory, we further analyze it to provide you with our health and/or ancestry reports, dependent on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If you are eligible to receive additional reports or updates in the future, you may be notified of or may directly access these updates.

c. **To allow you to share your Personal Information with others**

23andMe gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share sensitive data.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. **To allow you to share your Personal Information for 23andMe Research purposes**

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the Main Research Consent Document:

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the Main Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe partners for Research purposes.

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Withdrawing Your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andme.com (<https://web.archive.org/web/20180820183119/mailto:hpa@23andme.com>). 23andMe will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from 23andMe Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in 23andMe Research by deleting your 23andMe account (as described in section 5.d).

What happens if you do NOT consent to 23andMe Research? If you choose not to complete a Consent Document or any additional agreement with 23andMe, your Personal Information will not be used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third party service providers to as outlined in this Privacy Statement.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of 23andMe's Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. However we will not share Individual-level Genetic Information or Self-Reported Information with any third party without your consent. If you do not wish to receive these notifications, you can manage them by editing your preferences in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

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For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

g. To conduct surveys or polls, and obtain testimonials

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. To provide you with marketing communications

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your Account Settings to edit your email notification preferences. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.d. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

a. General service providers.

We share the information described above in Section 2 with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit(s) to you, and in some cases help return your kit safely to our third party laboratory so your sample can be processed.
- ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. When the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

Additional Genetic Analyses. Unless you consent to Probanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, subject to the laboratory's legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your Account Settings once your sample has completed processing. As detailed further in Section 5.d. (Account Deletion) our contracted genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to the Service. Our IT and security providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.
- v. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on 23andMe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

b. **"Targeted advertising" service providers**

We permit third party advertising networks and providers to collect Web Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. For more information about our marketing practices, please review our [Cookie Policy](https://web.archive.org/web/20180820183119/https://www.23andme.com/about/cookies/). (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/cookies/>).

c. **Aggregate information**

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level [Genetic Information](#) or [Self-Reported Information](#) consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the

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Genetic Information about that user. 23andMe will ask for consent to share Individual Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. Information we share with commonly owned entities

We may share some or all of your Personal Information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20180820183119/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20180820183119/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20180820183119/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact

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Customer Care assistance. If you do not wish to provide 23andMe with certain information, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your Account Settings. You may also review and update your consent to 23andMe Research and Biobanking. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page (https://web.archive.org/web/20180820183119/https://you.23andme.com/research/all_questions_dashboard) by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.e. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account depending on where you are located. Otherwise, you may view or update your email notification preferences by visiting your Account Settings or by contacting our Privacy Administrator at privacy@23andMe.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andMe.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statements of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your Account Settings. Once you submit your request, we will send an email to the email address linked to your

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23andMe account detailing our account deletion policy and requesting that you to confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

- i. Information previously included in 23andMe Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. 23andMe and our third party genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA) and CA Business and Professional Code Section 1265 and CAP accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, and record of legal agreements for a limited period of time as required by contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. 23andMe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information.

- **23andMe produces secure applications by design.** 23andMe incorporates explicit security reviews in the software development lifecycle, quality assurance testing and operational deployment.
- **De-identification/Pseudonymization.** Registration Information is stripped from Sensitive Information, including Genetic and Self-Reported Information. This data is then assigned a randomly generated ID so an individual cannot reasonably be identified.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Separation of Environments.** 23andMe ensures processing, production, and research environments are separated and access is restricted. Data, including Registration Information, Genetic Information, and Self-Reported Information are segmented across logical database systems to further prevent re-identifiability.
- **Limiting access to essential personnel.** We limit access to Personal Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our processes and regularly engage third party security experts to conduct penetration tests.

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- **Incident Management.** 23andMe maintains a formal incident management program designed to ensure the secure, continuous delivery of its Services. 23andMe has implemented an incident management program using industry best practices, including guidance from the National Institute of Standards and Technology (NIST).
 - **Managing third party service providers.** 23andMe requires service providers to implement and maintain accepted industry standard administrative, physical and technical safeguards to protect Personal Information.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union (EU), European Economic Area (EEA), and Switzerland to the United States, respectively. 23andMe is committed to subjecting all Personal Information received from the EU member countries, EEA and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall

(<https://web.archive.org/web/20180820183119/https://www.privacyshield.gov/list>)

23andMe is responsible for the processing of Personal Information it receives, under the Privacy Shield Frameworks, or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

b. Our relationship with you

We are the “controller” with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. Legal bases for processing Personal Information from the EU

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. Direct Marketing

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please review and update your Account Settings as necessary or contact us at privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>). You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests of 23andMe. E.g., where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. Privacy Rights

We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your Account Settings, and your Self-Reported Information by going to the surveys page. You can download your raw Genetic Information within your Account Settings or by going to the applicable tool in "Tools." If you would like to access or rectify any other information, contact Customer Care and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 5.d. ("Account Deletion"), we allow our customers to delete their accounts at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have us transfer your Personal Information directly to another controller, where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.

- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you make a request for us to delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you request to delete your account, we will take the steps described under “Your Choices – Account Deletion” and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. **Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Global Privacy Officer, 23andMe, Inc.,
899 West Evelyn Avenue,
Mountain View, CA 94041
1.800.239.5230,
privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>).

Alternatively, you may contact 23andMe’s EU member representative, DPR Group, at
<https://www.dpr.eu.com/23andme>
(<https://web.archive.org/web/20180820183119/https://www.dpr.eu.com/23andme>).

23andMe’s commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint,

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shield/for-eu-consumers (<https://web.archive.org/web/20180820183119/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>), for more information and/or to file a complaint.

As a last resort and under limited circumstances, EU, EEA and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en (https://web.archive.org/web/20180820183119/https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en).

10. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our website for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective. 23andMe may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. Such notices may supplement or clarify 23andMe's privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

11. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20180820183119/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on July 17, 2018.**

[Read the previous version of the document. \(?version=5.0\)](#)

Exhibit 13

Privacy Highlights

These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to review the [Full Privacy Statement](#).

Information We Collect

We generally collect the following information:

- **Information we receive when you use our Services**, including our website, mobile apps, products, software and other services. We collect Web-Behavior Information via cookies and other similar tracking technologies when you use and access our Services, including browsing our websites, clicking on our ads, and accessing your account through our mobile app or website (see our [Cookie Policy](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/cookies/>)).
- **Information you share directly with us**. We collect and process your information when you place an order, create an account, register your 23andMe kit, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This data can be categorized as Registration Information, Self-Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services**. With your consent, we extract your DNA from your saliva sample and analyze it to derive your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with your 23andMe reports and tools.

How We Use Information

We generally process information for a number of different reasons:

- **To provide our Services**. We process information in order to provide our Service, which includes processing payments, shipping kits to customers, hosting our website, authenticating your account email and password, and analyzing your sample and DNA to deliver your results and power tools like DNA Relatives.
- **To analyze and improve our Services**. We are constantly working to improve and provide new reports, tools, and services. For example, we are constantly working to improve our ability to assign specific ancestries to your DNA segments and maximize the granularity of our results. We may also need to fix bugs or issues, analyze use of our website to improve the website experience or assess our marketing, or work to develop new tools and reports to provide to customers through the Services.
- **For 23andMe Research, with your consent**. If you choose to consent to participate in 23andMe Research, our researchers and qualified research collaborators can include your de-identified Genetic Information and Self-Reported Information in a large pool of customer data for analyses aimed at making scientific discoveries.

Control: Your Choices

23andMe gives you the ability to share information in a variety of ways. You choose:

- **To store or discard your saliva sample** after it has been analyzed.
- **Which health report(s)** you would like to view and/or opt-in to view.

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- You choose whether and with whom you share your information, including friends, family members, health care professionals, or other individuals outside our Services, including through third party services that accept 23andMe data and social networks.
 - You choose to give or decline consent for the use of your data for scientific research purposes through **23andMe Research** by agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a 23andMe Community.

Access To Your Information

We share information in the following ways:

- **With our service providers**, including our genotyping laboratory, as necessary for them to provide their services to us.
- **With other 23andMe customers**, when you request us to. For example, when you send a DNA Relative a message or add information to a public profile.
- **With research collaborators**, only if you have given your explicit consent.

23andMe will not sell, lease, or rent your individual-level information to any third party or to a third party for research purposes without your explicit consent.

- We do **not** share customer data with any **public databases**.
- We will **not** provide any person's data (genetic or non-genetic) to an **insurance company** or **employer**.
- We will **not** provide information to **law enforcement** or **regulatory authorities** unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information (visit our [Transparency Report](https://web.archive.org/web/20180614123807/https://www.23andme.com/transparency-report/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/transparency-report/>)).

How We Secure Information

23andMe implements measures and systems to ensure confidentiality, integrity, and availability of 23andMe data.

- **De-identification/Pseudonymization, encryption, and data segmentation.** Registration information is stripped from sensitive information, including genetic and phenotypic data. This data is then assigned a randomly generated ID so the data cannot reasonably be identified. 23andMe uses industry standard security measures to encrypt sensitive personal data both at rest and in transit. Additionally, data are segmented across logical database systems to further prevent re-identifiability.
- **Limiting access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our build pipeline and regularly engage third party security experts to conduct penetration tests.

Risks and Considerations

There may be some consequences of using 23andMe Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.

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- You used a service or product that we previously linked to you, and you may learn that someone you thought you were related to is not your biological relative.
 - In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.

Full Privacy Statement

This Privacy Statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including [www.23andme.com](https://web.archive.org/web/20180614123807/https://www.23andme.com/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/>), and any other websites, pages, features, or content we own or operate and/or when you use the 23andMe mobile app and any related services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this [Privacy Statement](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/>) and our [Terms of Service](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/>). By using our Services, you acknowledge all of the policies and procedures described in the foregoing documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service you should immediately discontinue use of our Services.

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** information you provide directly to us, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.

- d. **Sensitive Information:** information about your health, genetic information and Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
 - e. **User Content:** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Web Behavior Information:** information on how you use 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, web beacons, and similar technology.
5. **Service or Services:** 23andMe's products, software, web applications, and website (including but not limited to text, graphics, pages, content, images, features and other material and information) as accessed from time to time by the user, regardless if the use is in connection with an account or not.

2. Information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you purchase our Services or create a 23andMe account and register your kit, we collect Personal Information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information (e.g. email, phone number and license number).
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on 23andMe's Forums.
- iv. **Blogs and Forums.** Our website offers publicly accessible blogs and Forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forum, contact us at privacy@23andme.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. Note also that you may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's privacy statement.
- v. **Social Media Features and Widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third-party social media services to provide us information

about you, including your name, email address and phone number. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The information we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third-party or hosted directly on our site. Your interactions with these Features are governed by the privacy statement of the third party company providing it. You should always review, and if necessary, adjust your privacy settings on third party websites and services before linking or connecting them to our website or Service.

- vi. **Third party services (e.g., social media).** If you use a third party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully.
- vii. **Referral Information and Sharing.** When you refer a person to 23andMe or choose to share your 23andMe results with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to communicate your sharing request to that person, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20180614123807/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20180614123807/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- viii. **Gifts.** If you provide us with Personal Information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our [Privacy Statement](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/>), our [Terms of Service](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/>), and if applicable, certain [Consent Documents](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/consent) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/consent>), his or her Personal Information will be used consistent with this Privacy Statement and those agreements, and will not be shared with the user who purchased the gift, unless they individually choose to share their own Personal Information through the Services with this individual.
- ix. **Customer service.** When you contact [Customer Care](https://web.archive.org/web/20180614123807/https://customercare.23andme.com/) (<https://web.archive.org/web/20180614123807/https://customercare.23andme.com/>) or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our [Terms of Service](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/>), [Privacy Statement](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/privacy/>).

applicable laws or regulations, and analyze and improve our Services.

b. **Information related to our genetic testing services**

- i. **Saliva sample and biobanking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, create an online account and register your kit, and ship your saliva sample to our third party laboratory. During kit registration you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to sample storage ("Biobanking") and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, pursuant to the laboratory's legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your Account Settings once your sample has completed processing.
- ii. **Genetic Information.** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), your Genetic Information, is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe Results reported to you as part of our Services, and may be used for other purposes, as outlined in Section 4 below.

c. **Web Behavior Information collected through tracking technology (e.g. from cookies and similar technologies)**

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our Services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe and how to control cookies, please read our [Cookie Policy](https://web.archive.org/web/20180614123807/https://www.23andme.com/about/cookies/). (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/cookies/>)

We may receive reports based on the use of these technologies from third party service providers on a de-identified, Individual-level or Aggregated basis. We and our third party service providers do not use your Sensitive Information, such as [Genetic Information](#) and [Self-Reported Information](#), for targeted advertising.

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our Service. **Learn more about how Google collects and uses data [here](https://web.archive.org/web/20180614123807/https://policies.google.com/technologies/partner-sites)** (<https://web.archive.org/web/20180614123807/https://policies.google.com/technologies/partner-sites>). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](https://web.archive.org/web/20180614123807/https://www.google.com/settings/ads) (<https://web.archive.org/web/20180614123807/https://www.google.com/settings/ads>). To opt out of Google Analytics entirely please use [this link](https://web.archive.org/web/20180614123807/https://tools.google.com/dlpage/gaoptout) (<https://web.archive.org/web/20180614123807/https://tools.google.com/dlpage/gaoptout>).

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

3. How we use your information

23andMe will use and share your Personal Information with third parties only in the ways that are described in this Privacy Statement.

a. To provide you with Services and analyze and improve our Services

We use the information described above in Section 2 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with other commitments in this Privacy Statement, to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (collectively the "Designated Countries"): We process your Personal Information in this way to provide our Services to you in accordance with our Terms of Service.

(<https://web.archive.org/web/20180614123807/https://www.23andme.com/en-eu/about/tos/>)

b. To process, analyze and deliver your genetic testing results

As described above, to receive results through the Personal Genetic Service, you must create a 23andMe account, register your kit, and submit your saliva sample to our contracted genotyping laboratory, which processes and analyzes your sample to provide us with your raw genetic data. Once we receive your raw genetic data from the laboratory, we further analyze it to provide you with our health and/or ancestry reports, dependent on the Service purchased. 23andMe continuously works to improve our Services based on our research and product development, and genetic associations identified in scientific literature. If we are able to offer additional reports, or otherwise improve reports in the future, you will be notified of these changes.

For individuals located in the Designated Countries: We process your Personal Information in this way is to provide our Services to you in accordance with our Terms of Service.

c. To allow you to share your Personal Information with others

23andMe gives you the ability to share information including Personal Information with the Services. You have the option to share directly with individuals with 23andMe accounts through (i) our Forums, (ii) relative finding features (e.g., "DNA Relatives"), (iii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share sensitive data.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

d. To allow you to share your Personal Information for 23andMe Research purposes

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe.

23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed the Main Research Consent Document:

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for Research purposes.
- iii. 23andMe may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/individual-data-consent/>), or additional consent agreement, in addition to the uses above under the Main Consent Document, 23andMe may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for 23andMe partners for Research purposes.

Withdrawing your Consent. You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status within your Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andMe.com

What happens if you do NOT consent to 23andMe Research? If you choose not to complete a Consent Document or any additional agreement with 23andMe, your Personal Information will not be used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third party service providers to as outlined in this Privacy Statement.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

e. To recruit you for external research

Research is an important aspect of 23andMe's Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in 23andMe Research, from time to time we may inform you of third party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe research participants who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. However we will not share Individual-level Genetic Information or Self-Reported Information with any third party without your consent. If you do not wish to receive these alerts, you can manage them by editing your preferences in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

f. To provide customer support

When you contact Customer Care, we may use or request Personal Information and/or Sensitive Information as necessary to answer your questions, resolve disputes, or troubleshoot problems. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

- g. **To conduct surveys, polls, and obtain testimonials.** We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is important to continue improving our Services to ensure your continued enjoyment.

h. **To provide you with marketing communications**

By creating a 23andMe account, you are agreeing that we may send you product and promotional emails or notifications about our Services, and offers on new products, services, promotions or contests. You can unsubscribe from receiving these marketing communications at any time. To unsubscribe, click the email footer "unsubscribe" link or go to the "Preferences" section of your Account Settings to edit your email notification preferences. You may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

Individuals located in Designated Countries should review Section 9.c. to understand our marketing practices in relation to the Designated Countries.

4. Information we share with third parties

- a. **General service providers.** We share the information described above in Section 3 with our third party service providers, as necessary to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While 23andMe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:
- i. **Order fulfillment and shipping.** Our payment processor processes certain Registration Information, such as your billing address and credit card information, as necessary to enable you to purchase a 23andMe kit from the 23andMe.com online store. Our distribution centers ship your kit to you, and in some cases help return your kit safely to our third party laboratory so your sample can be processed.
 - ii. **Our CLIA-certified genotyping lab.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genetic Service testing kit, and ship your saliva sample to our third party laboratory. Once delivered, receiving personnel at the laboratory remove and discard kit packaging, which in some cases may contain "sender information" (e.g., name, address), before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are only identified by a unique barcode. When the laboratory has completed their analysis, they securely send the resulting Genetic Information to us identified by your unique barcode.

During kit registration, you are asked to review our Consent Document for Sample Storage and Additional Genetic Analyses. Unless you consent to Biobanking and additional analyses, your saliva sample and DNA are destroyed after the laboratory completes its work, pursuant to the laboratory's legal and regulatory requirements. Should you wish to update your sample storage preference to discard a stored sample, you can do so within your Account Settings once your sample has

genotyping laboratory will retain certain information as necessary to comply with applicable regulatory and legal obligations.

- iii. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we get to ensure they receive timely and helpful information and quality support, including email and phone support.
- iv. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in 23andMe databases, ensure that our infrastructure can support continued use of our Services by 23andMe customers, and protect data in the event of a natural disaster or other disruption to the Service. Our IT and security providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit 23andMe's security controls.
- v. **Marketing and analytics.** When you visit our EU, UK, or International websites you will be presented with a cookie opt in. If you choose to consent to allow Functionality and Advertising Cookies our third party service providers may collect information about your visit, the links you clicked on, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns.

NOTE: Our service providers act on 23andMe's behalf. While we implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

b. **"Targeted advertising" service providers**

We permit third party advertising networks and providers to collect Web Behavior Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. For more information about our marketing practices, please review our Cookie Policy.

c. **Aggregate information**

We may share De-identified, Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. or disclose any particular individual's For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. 23andMe will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

d. **Information we share with commonly owned entities**

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We may share some or all of your Personal Information with our commonly owned ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. As required by law

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service (<https://web.archive.org/web/20180614123807/https://www.23andme.com/about/tos/>) and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. View our Transparency Report (<https://web.archive.org/web/20180614123807/https://www.23andme.com/transparency-report/>) for more information.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your Personal Information involved in such Research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<https://web.archive.org/web/20180614123807/https://grants.nih.gov/grants/policy/coc/index.htm>).

f. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

5. Your choices

a. Access to your account

We provide access to your 23andMe data within your 23andMe account. You can access and download data processed by 23andMe within your Account Settings and within applicable Reports, Tools, and features. If you lose access to your 23andMe account or account email address, please contact Customer Care for assistance. If you lose access to your 23andMe account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, 23andMe will not be able to sufficiently verify your identity in order to complete your request.

You may also correct or update your Self-Reported Information on your own with your Account Settings. You may also review and update your consent to 23andMe Research and Biobanking choices. You may be able to correct Self-Reported Information entered into a survey, form, or feature from your account on the [surveys page](https://web.archive.org/web/20180614123807/https://www.23andme.com/you/23andme/surveys/list/) (<https://web.archive.org/web/20180614123807/https://www.23andme.com/you/23andme/surveys/list/>), by clicking "Edit your answers here." Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties.

Individuals located in Designated Countries should review Section 9.d. to understand their rights to access Personal Information.

b. Marketing communications

As noted in Section 3.e. you may be asked to opt-in to receive product and promotional emails or notifications when creating your 23andMe account depending on where you are located. Otherwise, you may view or update your email notification preferences by visiting your Account Settings or by contacting our Privacy Administrator at privacy@23andMe.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andMe.com>). You can also click the "unsubscribe" button at the bottom of promotional email communications.

c. Sharing outside of the 23andMe Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third party services such as social networks and third party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your Personal Information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy statement of all other third parties involved in the transaction. 23andMe does not endorse or sponsor any API application, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, Personal Information, once shared or disclosed, can be difficult to contain or retrieve. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your 23andMe account and Personal Information within your Account Settings. Once you submit your request, we will send an email to the email address linked to your 23andMe account detailing our account deletion policy and requesting that you to confirm your request. Once you confirm your request to delete your data, your account will no longer be accessible while we process your request. Once confirmed, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

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- i. Information previously included in 23andMe Research As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from ongoing or completed studies that use that information.
- ii. Legal Retention Requirements. 23andMe and our third party genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA) and CA Business and Professional Code Section 1265 and CAP accreditation requirements. 23andMe will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, and record of legal agreements for a limited period of time as required by contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

6. Security measures

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe implements physical, technical, and administrative measures to safeguard your Personal Information.

- **23andMe produces secure applications by design.** 23andMe incorporates explicit security reviews in the software development lifecycle, quality assurance testing and operational deployment.
- **De-identification/Pseudonymization.** Registration Information is stripped from Sensitive Information, including Genetic and Self-Reported Information. This data is then assigned a randomly generated ID so an individual cannot reasonably be identified.
- **Encryption.** 23andMe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- **Separation of Environments.** 23andMe ensures processing, production, and research environments are separated and access is restricted. Information is de-identified using randomly assigned IDs. Categories of data, including Registration Information, Genetic Information, and Self-Reported Information are segmented across logical database systems to further prevent re-identifiability.
- **Limiting access to essential personnel.** We limit access to Personal Information to authorized personnel, based on job function and role. 23andMe access controls include multi-factor authentication, single sign-on, and strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** 23andMe uses state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our processes and regularly engage third party security experts to conduct penetration tests.
- **Incident Management.** 23andMe maintains a formal incident management program designed to ensure the secure, continuous delivery of its Services. 23andMe has implemented an incident management program using industry best practices, including guidance from the National Institute of Standards and Technology (NIST).
- **Managing third party service providers.** 23andMe requires service providers to implement and maintain accepted industry standard administrative, physical and technical safeguards to protect Personal Information.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

7. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

8. Linked websites

23andMe provides links to third party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe and our service providers on our behalf.

9. Information for Customers in Designated Countries

Section 9 only applies to individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland (the "Designated Countries").

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union (EU), European Economic Area (EEA), and Switzerland to the United States, respectively. 23andMe is committed to subjecting all Personal Information received from the EU member countries, EEA and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [U.S. Department of Commerce's Privacy Shield List](https://www.privacyshield.gov/list).
(<https://web.archive.org/web/20180614123807/https://www.privacyshield.gov/list>)

23andMe is responsible for the processing of Personal Information it receives, under the Privacy Shield Frameworks, or subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU, EEA and Switzerland, including the onward transfer liability provisions.

Without affecting the Personal Information already in use or transferred, 23andMe, 23andMe works, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

b. **Our relationship with you**

We are the controller with respect to your Personal Information because we determine the means and purposes of processing your information when using our Services.

c. **Legal bases for processing Personal Information from the EU**

We describe how we process your Personal Information in Sections 2 through 4 of this Privacy Statement. We may process your Personal Information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of 23andMe, our customers or others.

d. **Direct Marketing**

We will obtain your consent where required to send you marketing communications using electronic means. You may withdraw your consent at any time within your Account Settings or by emailing privacy@23andme.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>). We will only contact you by electronic means (email, push notification, SMS, etc.) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

We will only share your Personal Information with third parties for marketing purposes with your explicit consent. If you do not want us to use your Personal Information in this way, please contact us at privacy@23andme.com. You may raise such objection with regard to initial or further processing for purposes of direct marketing at any time and free of charge. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

Other marketing activities will happen based on the legitimate interests. E.g. where we tailor marketing communications or send targeted marketing messages via post, phone or social media and other third party platforms; and in providing existing customers with information (via email or other channels) about similar products and services.

e. **Privacy Rights**

You can exercise your privacy rights by following the instructions below or contacting us at privacy@23andme.com. (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>) We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security.

- i. **Right to withdraw consent.** To the extent 23andMe requests and you provide your consent to the processing of your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- ii. **Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your Account Settings, and your Self-Reported Information by going to the surveys page. You can download your raw Genetic Information by going to "Tools." If you would like to access or rectify any other information, contact Customer Care and we

will not be able to provide it to you. We may delete or anonymize your request if responding to your request could adversely affect the rights and freedoms of others.

- iii. **Right to erasure (or, "Right to be Forgotten").** As explained under Section 6.e. "Account Deletion," we allow our customers to delete their accounts at any time. You can request erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform controllers which are processing the Personal Information that you have requested the erasure by such controllers of any links to, or copy or replication of, such Personal Information. Our assistance with your request for erasure is subject to limitations by relevant data protection laws.
- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have us transfer your Personal Information directly to another "controller", where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by 23andMe (for a period enabling us to verify its accuracy); (b) the processing is unlawful and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) 23andMe no longer needs the Personal Information for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether 23andMe's legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract or legitimate interests described under Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.

ix. **Retention of your Personal Information.** Unless you make a request for us to delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you request to delete your account, we will take the steps described under "Your Choices - Account Deletion" and delete all your Personal Information, unless a longer retention period is required or permitted by law.

The rights described above may be limited by local laws. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

f. Complaints

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Global Privacy Officer, 23andMe, Inc.,
899 West Evelyn Avenue,
Mountain View, CA 94041
1.800.239.5230,
privacy@23andme.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>)

23andMe's commitment to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks entitle you to lodge a complaint via our Privacy Shield independent dispute resolution mechanism. To send your privacy complaints under the Privacy Shield Principles, please contact the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20180614123807/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and/or to file a complaint.

As a last resort and under limited circumstances, EU, EEA and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. You can find the relevant supervisory authority name and contact details under http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm (https://web.archive.org/web/20180614123807/http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

10. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our website for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

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23andMe may provide additional "just in time" disclosures or additional information about the collection, use and sharing practices of specific Services. These notices may supplement or clarify 23andMe's privacy practices or may provide you with additional choices about how 23andMe processes your Personal Information.

11. Contact Information

If you have questions about this Privacy Statement, or wish to submit a complaint, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20180614123807/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on May 24, 2018.**

[Read the previous version of the document. \(?version=4.7\)](#)

Exhibit 14

Privacy Highlights

These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to read our [full privacy statement](#).

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our [Cookie Policy](#) (<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/cookies>)).
2. We use information in general (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, and customers as we reasonably believe is permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) when you consent, for research purposes, the results of which could be used to develop therapeutics.

CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, you consent to sensitive information, such as information about your health, Genetic Information, and Self-Reported Information such as racial and ethnic origin and sexual orientation (where you provide it) being used by us to:

1. analyze and provide you with our Services;
2. analyze and provide you with information about your ancestry;
3. determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. monitor and improve existing products or services that we offer or to develop new products and services

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and countries outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or to a third-party for research purposes without your explicit consent.

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3. We give you the ability to share information with other individuals through features like DNA Relatives. You will always need to take a positive action to share your information, for example, DNA Relatives is subject to an opt-in requirement before we share your information with potential relative matches.
 4. You may independently decide to disclose your information to friends and/or family members, doctors, health care professionals, or other individuals outside our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"); always review the privacy policies of third-party apps and services before sharing your information.
 5. We may share anonymized and aggregate information with third-parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and aggregated with information of others or anonymized so that you cannot reasonably be identified as an individual.
 6. We will use your genetic information and/or self-reported information and share it with third-parties for scientific research purposes only if you sign the appropriate Consent Document (<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/consent>). Note that we will disclose your individual-level information only if we obtain additional explicit consent from you.
 7. There may be some consequences of using 23andMe Services that you haven't thought of, you should read our guide (<https://web.archive.org/web/20180509185352/https://customer care.23andme.com/hc/articles/202907980-What-unexpected-things-might-I-learn-from-23andMe->) of the surprising things you may find out from using the service before submitting your saliva sample and personal information.
 8. If you have any questions about our privacy practices, please email us at privacy@23andme.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>) or send a letter to the address provided at the bottom of our full privacy statement (<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/privacy/#jump-link-content-contact-information>).

Full Privacy Statement

This privacy statement applies to all websites owned and operated by 23andMe, Inc ("23andMe"), including www.23andme.com. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when operating our website, mobile apps, products, software and other services (collectively "**Service**" or "**Services**").

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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **Anonymized Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.

- d. **Sensitive Information:** information about your health, genetic information and Self-Reported Information such as racial and ethnic origin and sexual orientation.
 - e. **User Content:** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information- generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Web Behavior Information:** information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.
5. **Service or Services:** 23andMe's products, software, services, and website (including but not limited to text, graphics, images, and other material and information) as accessed from time to time by the user, regardless if the use is in connection with an account or not.

2. Principles

The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, customers, as we reasonably believe is permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) when you consent, for research purposes, the results of which could be used to develop therapeutics.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or to a third-party for research purposes without your explicit consent.
3. We understand and respect the sensitive nature of the information you may provide to us, including information about your genetic characteristics, disease conditions, racial and ethnic origin, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third-parties. Please see below to learn more about our sharing and consent practices.
4. We are committed to providing a secure and safe environment for our Services.

Please review this [Privacy Statement\(\)](#) and our [Terms of Service](#)

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/tos/>). By using our Services, you agree to all of the policies and procedures described in the foregoing documents. 23andMe, Inc. is headquartered at 899 West Evelyn Avenue, Mountain View, CA 94041 and is referred to herein as 23andMe (or "we," "us," "our") and includes all of our commonly owned companies.

3. What information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you register an account with us or purchase our Services, we collect personal information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information such as your email and phone number and license number.
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type

23andMe's other health-related information (e.g. information on a child's test results) and family history information (e.g. information similar to the foregoing about your family members).

Where you are disclosing information about a family member, you should make sure that you have permission from the family member to do so.

- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any post or message you place on 23andMe's community forums.
- iv. **Blogs.** Our website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or anonymize your personal information from our blog or community forum, contact us at privacy@23andme.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>). Please note that whenever you post something publicly, it may sometimes be impossible to remove the information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share personal information publicly on our blogs, community forums or in any other posting. Note also that you may be required to register with a third-party application to post a comment. To learn how the third-party application uses your information, please review their privacy statement.
- v. **Social Media Features and Widgets.** Our website includes Social Media Features, such as the Facebook Like or Share button and Widgets, and the LinkedIn Open ID application ("**Features**"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third-party social media services to provide us information about you, including your name, email address, and other contact information. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The data we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third-party or hosted directly on our site. Your interactions with these Features are governed by the privacy statement of the company providing it. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
- vi. **Referral Information and Sharing.** When you refer a person to 23andMe or choose to share results information with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>) to request that we remove this information from our database. For more information on our referral program, see [here](https://web.archive.org/web/20180509185352/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002) (<https://web.archive.org/web/20180509185352/http://refer.23andme.com/terms-and-conditions/53ce656f5e29cc6df9000002>).
- vii. **Address books.** If you choose to use your computer's or mobile device's address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.

viii. **Third-party services (e.g., social media).** If you use third-party sites such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.

- ix. **Gifts.** If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/privacy>), our Terms of Service

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/tos>), and if applicable, Consent Document

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/consent>), his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.

- x. **Customer service.** When you contact our Customer Care

(<https://web.archive.org/web/20180509185352/https://customer care.23andme.com/>) center or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/tos>), Privacy Statement

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/privacy>) or applicable laws or regulations; and analyze and improve our Services.

b. Information related to our genetic testing services

- i. **Saliva sample and bio-banking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genome Service® testing kit, register an online account, and ship your saliva sample to our third-party laboratory. Once received, your saliva sample will be identified by its unique barcode, along with your gender and your date of birth. The barcode label identifies you to us but not to our third-party laboratory. Unless you choose to store your sample with 23andMe (called consent to "bio-banking", which can be found here

(<https://web.archive.org/web/20180509185352/https://www.23andme.com/legal/biobanking>) and changed in your settings), your saliva samples and DNA are destroyed after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples.

- ii. **Genetic Information.** Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe Results information reported to you as part of our Services, and may be used for other purposes, as outlined in Section 4 below.

c. Information collected through tracking technology (e.g. from cookies and similar technologies)

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Web Behavior Information. We and our third-party partners use similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our products and services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. We and our third-party partners do not use your sensitive information, such as Genetic Information and Self-Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe, please read our Cookie Policy.
(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/cookies>).

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

When you access our Service by or through a mobile device, we may receive or collect and store a unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers ("IDFA"), Google Ad ID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device.

Because 23andMe relies on third-party ad networks who may track you across websites over time for advertising purposes, we are not able to respond to your selection of the "Do Not Track" option provided by your browser. We cannot advise on whether your selection of "Do Not Track" option will have any effect on the collection of cookie information by the third-parties who collect such cookie information on our site. Please see Section 4.d.ii, below, to learn more about our third-party advertising partners, and visit our Cookie Policy.
(<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/cookies>) to learn more about tracking cookies.

Third-parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use Flash Cookies (Local Shared Objects) to collect and store information. To learn how to manage privacy and storage settings for Flash cookies click here.
(<https://web.archive.org/web/20180509185352/https://www.macromedia.com/support/documentation/en/f>

Google Analytics. Google Analytics is used to perform many of the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not

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me, information collected through our advertising tool, and information collected elsewhere by our service. **Learn more about how Google collects and uses data here.** To opt out of Google Analytics Advertising Features please use Google Ad Settings (<https://web.archive.org/web/20180509185352/https://www.google.com/settings/ads>) or the links provided in section 2.b.c.ii ("Targeted advertising" service providers). To opt out of Google Analytics entirely please use this link. (<https://web.archive.org/web/20180509185352/https://tools.google.com/dlpage/gaoptout>)

d. Other Types of Information.

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement, as needed.

4. How we use and share information

23andMe will use and share your personal information with third-parties only in the ways that are described in this privacy statement.

a. Using information to provide, analyze and improve our Services

We use the information described above in Section 3 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with other commitments in this privacy statement, to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. conduct analytics to improve and enhance our Services;
- iv. offer new products or services to you, including through emails, promotions or contests;
- v. implement online marketing campaigns and targeted advertising, including by utilizing third-party ads (subject to your cookie settings and preferences), and to measure the effectiveness of our marketing and targeted advertising;
- vi. conduct surveys or polls, and obtain testimonials;
- vii. process and deliver your genetic testing results;
- viii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

You may be able to opt-in, opt-out or otherwise adjust your preferences of having your information used for certain of these activities. Please see below to learn more.

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

b. Using information with your consent

"23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe. 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third-parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses your aggregate or individual-level Genetic Information and Self-Reported Information as specified in the Consent Document.

- i. **Consent process for research.** Your Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:
 1. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for Research purposes. If you have completed the Individual Level Data Sharing Consent, 23andMe and select third party research partners may use individual-level Genetic Information and Self-Reported Information for Research purposes.
 2. When your Genetic Information and/or Self-Reported Information is being used for research purposes, it will not be linked to your Registration Information.
 - ii. **Withdrawing your Consent.** You may withdraw your consent to participate in Research at any time by changing your consent status within your 23andMe Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@23andMe.com (<https://web.archive.org/web/20180509185352/mailto:hpa@23andMe.com>). 23andMe will not include your Genetic Information or Self-Reported Information in new research occurring after 30 days from the receipt of your request. Any research involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue your participation in research by closing your Personal Genome Service account. If you withdraw your consent for research your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate Information that does not identify you as an individual (as described in Section 4.d).
 - iii. **What happens if you do NOT consent to 23andMe Research?** If you do not complete a Consent Document or any additional consent agreement with 23andMe, your information will not be used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate or Anonymous Information that does not reasonably identify you as an individual (as described in Section 4.d).
- c. **Recruiting for external research**
- Academic institutions, healthcare organizations, and other groups are always conducting interesting new research projects. We want to make you aware of these opportunities. While we do not share individual-level Genetic Information or Self-Reported Information with third-parties without your consent, from time to time we may inform you of third-party research opportunities for which you may

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be eligible for a sample if a University of Illinois at Chicago research project sends an email to 23andMe members who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. If you do not wish to receive these alerts, you can manage them in your settings.

d. **Information we share with third-parties**

- i. **General service providers.** We share the information described above in Section 3 with our service providers, as necessary to provide their services to us. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. For example, we work with third-party laboratories and contractors to process and analyze your saliva sample for purposes of generating your Genetic Information.

NOTE: Our service providers act on 23andMe's behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

When you purchase a testing kit from 23andMe, you are instructed to send a saliva sample to our third-party laboratory with a unique barcode label. The unique barcode identifies you to us but not to the laboratory. We are also required to provide to the laboratory, your sex and date of birth or age pursuant to clinical laboratory requirements such as the Clinical Laboratory Improvement Amendments (CLIA). No other Registration Information (such as your name, address, email, phone number or other contact information) is required or provided to the laboratory. The receiving personnel at the laboratory will remove and discard your "sender information" from the packaging (e.g., name, address) before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle saliva samples that are labeled only with the unique barcode. Unless you choose to store your sample, DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. A de-identified copy of genotyping data will be kept in accordance with CLIA. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but again, labeled only with the barcode.

- ii. **"Targeted advertising" service providers.** We permit third-party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns.

If you wish to not have this information used for the purpose of serving you targeted ads, you may be able to opt-out of many advertising networks by visiting [here](https://web.archive.org/web/20180509185352/https://preferences-mgr.truste.com/) (<https://web.archive.org/web/20180509185352/https://preferences-mgr.truste.com/>) and [here](https://web.archive.org/web/20180509185352/https://www.networkadvertising.org/choices/#complete) (<https://web.archive.org/web/20180509185352/https://www.networkadvertising.org/choices/#complete> (if you are located in Canada, click [here](https://web.archive.org/web/20180509185352/http://youradchoices.ca/choices/) (<https://web.archive.org/web/20180509185352/http://youradchoices.ca/choices/>); or if you are

(<https://web.archive.org/web/20180509183332/http://www.youronlinechoices.eu/>)). Please note this does not mean that you have opted-out of being served advertising. You will continue to receive generic ads.

For more information about our advertising and marketing practices, please review our Cookie Policy (<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/cookies>).

- iii. **Aggregate information.** We may share aggregate information with third-parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be identified as an individual ("Aggregate Information"). This Aggregate Information is different from "individual-level" information. Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. We may provide such Aggregate Information in commercial arrangements with our business partners. In contrast, individual-level Genetic Information could reveal whether a specific user has a particular genetic trait, or all of the Genetic Information about that user. 23andMe will ask for your consent to share individual-level Genetic Information or Self-Reported Information with any third-party, other than our service providers as necessary for us to provide the Services to you.
- iv. **Information we share with commonly owned entities.** We may share some or all of your information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. **Disclosures required by law**

Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service and other policies; (c) respond to claims that any content violates the rights of third-parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your personal information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk

5. Your choices

a. Access to your account

If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information, or update your consent status and biobanking options. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page (<https://web.archive.org/web/20180509185352/https://www.23andme.com/you/23andme/surveys/list/>). Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third-parties, though we can work with you to prohibit your data from being shared with third-parties in the future. We will respond to your request to access within 30 days.

Upon request 23andMe will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at privacy@23andMe.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>).

b. Marketing communications

By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by visiting your Account page (go to Account, Settings, Notifications) or by contacting our Privacy Administrator at privacy@23andMe.com. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

For more information about our online advertising, please also refer to Section 4.d.ii above under the heading "Targeted Advertising Service Providers", and also refer to our Cookie Policy (<https://web.archive.org/web/20180509185352/https://www.23andme.com/about/cookies>).

c. Information you choose to share with others

23andMe gives you the ability to share information with other individuals who have 23andMe accounts through (i) our community forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features (such information is "User Content"). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. For example, we provide the ability to opt-in to our ancestry DNA Relatives Database where your information will be shared with potential relative matches. Alternatively, if you were participating in the DNA Relatives Database you may opt-out or change the visibility of your profile data by visiting your Settings. Also, please note that certain types of your User Content may be viewable by other 23andMe users and once posted, you may not be able to delete or modify such content.

You may decide to disclose your personal information to friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"). These third-parties may use your personal

information differently than we do in this Privacy Statement. Please make such choice carefully and review the privacy policies of all other third parties involved in the transaction. For example, if you have enabled a 23andMe sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. Likewise, if you are reading this because you have access to the personal information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. It is incumbent upon all users to share personal information and account access only with people they know and trust. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.

d. Account closure

If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to Customer Care (<https://web.archive.org/web/20180509185352/mailto:customercare@23andme.com>). When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in any applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit and compliance purposes.

6. Important Information

a. Privacy Shield

23andMe participates in and has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. 23andMe is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit U.S. Department of Commerce's Privacy Shield List (<https://web.archive.org/web/20180509185352/https://www.privacyshield.gov/list>).

23andMe is responsible for the processing of personal data it receives, under the Privacy Shield Frameworks, and subsequently transfers to a third party acting as an agent on its behalf. 23andMe complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

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With respect to personal data received or transferred pursuant to the Privacy Shield Framework, 23andMe is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, 23andMe may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-US and Swiss-US Privacy Shield Principles, 23andMe commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Statement should first contact 23andMe's Privacy Administrator at:

Privacy Administrator

23andMe, Inc.

899 West Evelyn Avenue

Mountain View, CA 94041

1.800.239.5230

privacy@23andme.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>)

23andMe has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> (<https://web.archive.org/web/20180509185352/https://www.bbb.org/EU-privacy-shield/for-eu-consumers>) for more information and to file a complaint.

Finally, as a last resort and under limited circumstances, EU and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

b. Security measures

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third-party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

c. Business transactions

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In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

d. Linked websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

e. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

f. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

7. Contact Information

If you have questions about this Privacy Statement, please email 23andMe's Privacy Administrator at privacy@23andme.com (<https://web.archive.org/web/20180509185352/mailto:privacy@23andme.com>), or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on September 29, 2016.**

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Exhibit 15

About 23andMe:

[Our Mission](#)

[Our Core Values](#)

[Media Center](#)

[Policy Forum](#)

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[Careers](#)

Who We Are:

[Board of Directors](#)

[Leadership Team](#)

[Editorial Advisors](#)

[Scientific Advisory Board](#)

[Research Team](#)

Privacy Highlights



These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to read our full privacy statement.

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our Cookie Policy).
2. We use information in general (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, and customers as we reasonably believe is permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) when you consent, for research purposes, the results of which could be used to develop therapeutics.

CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, you consent to sensitive information, such as information about your health, Genetic Information, and Self-Reported Information such as racial and ethnic origin and sexual orientation (where you provide it) being used by us to:

1. analyze and provide you with our Services;
2. analyze and provide you with information about your ancestry;
3. determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. monitor and improve existing products or services that we offer or to develop new products and services

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and countries outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or

- to a third party for research purposes without your explicit consent.
3. We give you the ability to share information with other individuals through features like DNA Relatives. You will always need to take a positive action to share your information, for example, DNA Relatives is subject to an opt-in requirement before we share your information with potential relative matches.
 4. You may independently decide to disclose your information to friends and/or family members, doctors, health care professionals, or other individuals outside our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"); always review the privacy policies of third-party apps and services before sharing your information.
 5. We may share anonymized and aggregate information with third-parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and aggregated with information of others or anonymized so that you cannot reasonably be identified as an individual.
 6. We will use your information and share it with third-parties for scientific research purposes only if you sign a Consent Document. Note that we will disclose your individual-level information only if we obtain additional explicit consent from you.
 7. There may be some consequences of using 23andMe Services that you haven't thought of, you should read our guide of the surprising things you may find out from using the service before submitting your saliva sample and personal information.
 8. If you have any questions about our privacy practices, please email us at privacy@23andme.com or send a letter to the address provided at the bottom of our full privacy statement.

Full Privacy Statement

This privacy statement applies to www.23andme.com owned and operated by 23andMe, Inc. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when operating our website, mobile apps, products, software and other services (collectively "**Service**" or "**Services**").

Contents

- Key Definitions
- Principles
- What information we collect
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1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **Anonymized Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information:
 - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
 - b. **Genetic Information:** information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, or assignees; or otherwise processed by and/or contributed to 23andMe.
 - c. **Self-Reported Information:** all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account.
 - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin and sexual orientation.
 - e. **User Content:** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
 - f. **Web Behavior Information:** information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.
5. **Service or Services:** 23andMe's products, software, services, and website (including but not limited to text, graphics, images, and other material and information) as accessed from time to time by the user, regardless if the use is in connection with an account or not.

2. Principles

The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, customers, as we reasonably believe is permitted by laws and regulations,

- (iv) to comply with laws and regulations we are subject to and (v) when you consent, for research purposes the results of which could be used to develop therapeutics.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or to a third-party for research purposes without your explicit consent.
 3. We understand and respect the sensitive nature of the information you may provide to us, including information about your genetic characteristics, disease conditions, racial and ethnic origin, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third-parties. Please see below to learn more about our sharing and consent practices.
 4. We are committed to providing a secure and safe environment for our Services.

Please review this Privacy Statement and our Terms of Service. By using our Services, you agree to all of the policies and procedures described in the foregoing documents. 23andMe, Inc. is headquartered at 899 West Evelyn Avenue, Mountain View, CA 94041 and is referred to herein as 23andMe (or "we," "us," "our") and includes all of our commonly owned companies.

3. What information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you register an account with us or purchase our Services, we collect personal information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information such as your email and phone number.
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Where you are disclosing information about a family member, you should make sure that you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any post or message you place on 23andMe's community forums.
- iv. **Blogs.** Our website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or anonymize your personal information from our blog or community forum, contact us at privacy@23andme.com. Please note that whenever you post something publicly, it may sometimes be impossible to remove the information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share personal information publicly on our blogs, community forums or in any other posting. Note also that you may be required to register with a third-party application to post a comment. To learn how the third-party application uses your information, please review their privacy statement.
- v. **Social Media Features and Widgets.** Our website includes Social Media Features, such as the Facebook Like or Share button and Widgets, and the LinkedIn Open ID application ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third-party social media services to provide us information about you, including your name, email address, and other contact information. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The data we receive is dependent upon your privacy

settings with the social network. Features are either hosted by a third-party or hosted directly on our site. Your interactions with these Features are governed by the privacy statement of the company providing it. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.

- vi. **Referral Information and Sharing.** When you refer a person to 23andMe or choose to share results information with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com to request that we remove this information from our database. For more information on our referral program, see [here](#).
- vii. **Address books.** If you choose to use your computer's or mobile device's address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.
- viii. **Third-party services (e.g., social media).** If you use a third-party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.
- ix. **Gifts.** If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement, our Terms of Service, and if applicable, Consent Document, his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.
- x. **Customer service.** When you contact our Customer Care center or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyze and improve our Services.

b. Information related to our genetic testing services

- i. **Saliva sample and bio-banking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genome Service® testing kit, register an online account, and ship your saliva sample to our third-party laboratory. Once received, your saliva sample will be identified by its unique barcode, along with your gender and your date of birth. The barcode label identifies you to us but not to our third-party laboratory. Unless you choose to store your sample with 23andMe (called consent to "bio-banking", which can be found [here](#) and changed in your settings), your saliva samples and DNA are destroyed after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples.
- ii. **Genetic Information.** Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe Results information reported to you as part of our Services, and may be used for other purposes, as outlined in Section 4 below.

Web Behavior Information. We and our third-party partners use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our products and services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. We and our third-party partners do not use your sensitive information, such as Genetic Information and Self-Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe, please read our Cookie Policy.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

When you access our Service by or through a mobile device, we may receive or collect and store a unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers ("IDFA"), Google Ad ID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device.

Because 23andMe relies on third-party ad networks who may track you across websites over time for advertising purposes, we are not able to respond to your selection of the "Do Not Track" option provided by your browser. We cannot advise on whether your selection of "Do Not Track" option will have any effect on the collection of cookie information by the third-parties who collect such cookie information on our site. Please see Section 4.d.ii, below, to learn more about our third-party advertising partners, and visit our Cookie Policy to learn more about tracking cookies.

Third-parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use Flash Cookies (Local Shared Objects) to collect and store information. To learn how to manage privacy and storage settings for Flash cookies click [here](#).

d. Other Types of Information.

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement, as needed.

4. How we use and share information

23andMe will use and share your personal information with third-parties only in the ways that are described in this privacy statement.

a. Using information to provide, analyze and improve our Services

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. conduct analytics to improve and enhance our Services;
- iv. offer new products or services to you, including through emails, promotions or contests;
- v. implement online marketing campaigns and targeted advertising, including by utilizing third-party ads (subject to your cookie settings and preferences), and to measure the effectiveness of our marketing and targeted advertising;
- vi. conduct surveys or polls, and obtain testimonials;
- vii. process and deliver your genetic testing results;
- viii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

You may be able to opt-in, opt-out or otherwise adjust your preferences of having your information used for certain of these activities. Please see below to learn more.

b. Using information with your consent

You have the choice to participate in 23andMe Research by providing your consent. "23andMe Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by 23andMe. 23andMe Research may be sponsored by, conducted on behalf of, or in collaboration with third-parties, such as non-profit foundations, academic institutions or pharmaceutical companies. 23andMe Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. 23andMe Research uses your aggregate or individual-level Genetic Information and Self-Reported Information as specified in the Consent Document.

- i. **Consent process for research.** Your Genetic and Self-Reported Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:
 1. 23andMe may use individual-level Genetic Information and Self-Reported Information internally at 23andMe for Research purposes. In addition, we may allow select third-party research contractors to access your individual level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 2. When your Genetic Information and/or Self-Reported Information is being used for research purposes, it will not be linked to your Registration Information.

ii. Withdrawing your Consent.

You may withdraw your consent to participate in Research at any time by changing your consent status on your 23andMe Account Settings page, or by sending a request to the Human Protections Administrator at hpa@23andMe.com. 23andMe will not include your Genetic Information or Self-Reported Information in new research occurring after 30 days from the receipt of your request. Any research

involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue your participation in research by closing your Personal Genome Service account. If you withdraw your consent for research your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate Information that does not identify you as an individual (as described in Section 4.d).

iii. **What happens if you do NOT consent to 23andMe Research?**

If you do not complete a Consent Document or any additional consent agreement with 23andMe, your information will not be used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate or Anonymous Information that does not reasonably identify you as an individual (as described in Section 4.d).

c. **Recruiting for external research**

Academic institutions, healthcare organizations, and other groups are always conducting interesting new research projects. We want to make you aware of these opportunities. While we do not share individual-level Genetic Information or Self-Reported Information with third-parties without your consent, from time to time we may inform you of third-party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to 23andMe members who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. If you do not wish to receive these alerts, you can manage them in your settings.

d. **Information we share with third-parties**

- i. **General service providers.** We share the information described above in Section 3 with our service providers, as necessary to provide their services to us. Service providers are third-parties (other companies or individuals) that help us to provide, analyze and improve our Services. For example, we work with third-party laboratories and contractors to process and analyze your saliva sample for purposes of generating your Genetic Information.

NOTE: Our service providers act on 23andMe's behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically. For example, to learn more about our third-party laboratories, [click here](#).

- ii. **"Targeted advertising" service providers.** We permit third-party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns.

If you wish to not have this information used for the purpose of serving you targeted ads, you may be able to opt-out of many advertising networks by visiting [here](#) and [here](#) (if you are located in Canada, [click here](#); or if you are located in the European Union [click here](#)). Please note this does not mean that you have opted-out of being served advertising. You will continue to receive generic ads.

iii. **Aggregate information.** We may share aggregate information with third-parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be identified as an individual ("Aggregate Information"). This Aggregate Information is different from "individual-level" information. Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. We may provide such Aggregate Information in commercial arrangements with our business partners. In contrast, individual-level Genetic Information could reveal whether a specific user has a particular genetic trait, or all of the Genetic Information about that user. 23andMe will ask for your consent to share individual-level Genetic Information or Self-Reported Information with any third-party, other than our service providers as necessary for us to provide the Services to you.

iv. **Information we share with commonly owned entities.** We may share some or all of your information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

e. **Disclosures required by law**

Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service and other policies; (c) respond to claims that any content violates the rights of third-parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your personal information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<http://grants.nih.gov/grants/policy/coc/index.htm>).

5. Your choices

a. Access to your account

If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information, or update your consent status and biobanking options. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page. Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be

able to delete information that has been shared with third parties, though we can work with you to prohibit your data from being shared with third-parties in the future. We will respond to your request to access within 30 days.

b. Marketing communications

By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by visiting your Account page (go to Account, Settings, Notifications) or by contacting our Privacy Administrator at privacy@23andMe.com. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

For more information about our online advertising, please also refer to Section 4.d.ii above under the heading "Targeted Advertising Service Providers", and also refer to our Cookie Policy.

c. Information you choose to share with others

23andMe gives you the ability to share information with other individuals who have 23andMe accounts through (i) our community forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features (such information is "User Content"). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. For example, we provide the ability to opt-in to our ancestry DNA Relatives Database where your information will be shared with potential relative matches. Alternatively, if you were participating in the DNA Relatives Database you may opt-out or change the visibility of your profile data by visiting your Settings. Also, please note that certain types of your User Content may be viewable by other 23andMe users and once posted, you may not be able to delete or modify such content.

You may decide to disclose your personal information to friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"). These third-parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third-parties involved in the transaction. For example, if you have enabled a 23andMe sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. Likewise, if you are reading this because you have access to the personal information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. It is incumbent upon all users to share personal information and account access only with people they know and trust. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.

d. Account closure

If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to Customer Care. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in any applicable Consent Document, however, Genetic Information and/or Self-Reported

Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit and compliance purposes.

6. Important Information

a. TRUSTe

23andMe, Inc. has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this website, www.23andme.com and through our mobile application.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe [here](https://www.truste.com).

b. Safe Harbor

23andMe complies with the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union (EU) member countries and Switzerland. 23andMe has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view 23andMe's certification, please visit: <http://www.export.gov/safeharbor/>.

c. Security measures

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third-party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

d. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

f. Children's privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

g. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

7. Contact Information

If you have questions about this Privacy Statement, please email 23andMe's Privacy Administrator at privacy@23andme.com, or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on December 7, 2015.**
Read the previous version of the document.



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CONNECT WITH US

Facebook
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CHANGE LOCATIO

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Exhibit 16

[welcome](#) [ancestry](#) [research](#) [how it works](#) [buy](#) [help](#) [Q](#)

About 23andMe:

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[Media Center](#)
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Who We Are:

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[Editorial Advisors](#)
[Scientific Advisory Board](#)
[Research Team](#)

Privacy Highlights



These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to read our full privacy statement.

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our Cookie Policy).
2. We use information in general (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, customers as we reasonably believe permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to.

CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, you consent to sensitive information, such as information about your health, Genetic Information, and Self-Reported Information such as racial and ethnic origin and sexual orientation (where you provide it) being used by us to:

1. analyze and provide you with our Services;
2. analyze and provide you with information about your ancestry;
3. determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. monitor and improve existing products or services that we offer or develop new products and services

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and countries outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third party or to a third party for research purposes without your explicit consent.
3. We give you the ability to share information with other individuals through features like DNA Relatives. You will always need to take a positive action to share your information, for example, DNA Relatives is subject to an opt-in requirement before we share your information with potential relative matches.
4. You may independently decide to disclose your information to friends and/or family members, doctors, health care professionals, or other individuals outside our Services, including through third party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"); always review the privacy policies of third-party apps and services before sharing your information.
5. We may share anonymized and aggregate information with third parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and aggregated with information of others or anonymized so that you cannot reasonably be identified as an individual.

6. We will use your information and share it with third parties for scientific research purposes only if you sign a Consent Document. Note that we will disclose your individual-level information only if we obtain additional explicit consent from you.
7. There may be some consequences of using 23andMe Services that you haven't thought of, you should read our guide of the surprising things you may find out from using the service before submitting your saliva sample and personal information.
8. If you have any questions about our privacy practices, please email us at privacy@23andme.com or send a letter to the address provided at the bottom of our full privacy statement.

Full Privacy Statement

This privacy statement applies to www.23andme.com owned and operated by 23andMe, Inc. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when operating our website, mobile apps, products, software and other services (collectively "**Service**" or "**Services**"). The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, such as for marketing and advertising purposes, and (iii) as reasonably necessary to comply with laws and regulations, and to protect the security and safety of our company, employees, customers and others.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third party or to a third party for research purposes without your explicit consent.
3. We understand and respect the sensitive nature of the information you may provide to us, including information about your genetic characteristics, disease conditions, racial and ethnic origin, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third parties. Please see below to learn more about our sharing and consent practices.
4. We are committed to providing a secure and safe environment for our Services.

Please review this Privacy Statement and our Terms of Service. By using our Services, you agree to all of the policies and procedures described in the foregoing documents. 23andMe, Inc. is headquartered at 899 West Evelyn Avenue, Mountain View, CA 94041 and is referred to herein as 23andMe (or "we," "us," "our") and includes all of our commonly owned companies.

1. What information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you register an account with us or purchase our Services, we collect personal information, such as your name, date of birth, billing and shipping address, payment information (e.g., credit card) and contact information such as your email and phone number.
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Where you are disclosing information about a family member, you should make sure that you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any post or message you place on 23andMe's community forums.
- iv. **Blogs.** Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or anonymize your personal information from our blog or community forum, contact us at privacy@23andme.com. Please note that whenever you post something publicly, it may sometimes be impossible to remove the information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share personal information publicly on our blogs, community forums or in any other posting. Note also that you may be required to register with a third party application to post a comment. To

- v. **Social Media Features and Widgets.** Our Web site includes Social Media Features, such as the Facebook Like or Share button and Widgets, and the LinkedIn Open ID application ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The data we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy statement of the company providing it. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
- vi. **Testimonials.** We may post customer testimonials either on our website or in other online or offline formats. Customer testimonials may contain personal information and it is our policy to request consent from customers in advance of using testimonials. If you wish to update or delete your testimonial, you can contact us at privacy@23andme.com.
- vii. **Referral Information and Sharing.** When you refer a person to 23andMe or choose to share results information with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. The person you referred may contact us at privacy@23andme.com to request that we remove this information from our database. For more information on our referral program, see [here](#).
- viii. **Address books.** If you choose to use your computer's or mobile device's address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.
- ix. **Third-party services (e.g., social media).** If you use a third-party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.
- x. **Gifts.** If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement, our Terms of Service, and if applicable, Consent Document, his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.
- xi. **Customer service.** When you contact our Customer Care center or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyze and improve our Services.

b. Information related to our genetic testing services

1. **Saliva sample and bio-banking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genome Service® testing kit, register an online account, and ship your saliva sample to our third-party laboratory. Once received, your saliva sample will be identified by its unique barcode, along with your gender and your date of birth. The barcode label identifies you to us but not to our third-party laboratory. Unless you choose to store your sample with 23andMe (called "bio-banking"), your saliva samples and DNA are destroyed after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples.
2. **Genetic Information.** Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe Results information reported to you as part of our Services, and may be used for other purposes, as outlined in Section 2 below.

Web Behavior Information. We and our third party partners use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our products and services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. We and our third party partners do not use your sensitive information, such as Genetic Information and Self-Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe, please read our Cookie Policy.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

Because 23andMe relies on third party ad networks who may track you across websites over time for advertising purposes, we are not able to respond to your selection of the "Do Not Track" option provided by your browser. We cannot advise on whether your selection of "Do Not Track" option will have any effect on the collection of cookie information by the third parties who collect such cookie information on our site. Please see Section 2.c.ii, below, to learn more about our third party advertising partners, and visit our Cookie Policy to learn more about tracking cookies.

We use Local Shared Objects, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use Flash Cookies (Local Shared Objects) and HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. To learn how to manage privacy and storage settings for Flash cookies click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#11

d. Other Types of Information.

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement, as needed.

2. How we use and share information

23andMe will use and share your personal information with third parties only in the ways that are described in this privacy statement.

a. Using information to provide, analyze and improve our Services

We use the information described above in Section 1 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with other commitments in this privacy statement, to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. conduct analytics to improve and enhance our Services;
- iv. offer new products or services to you, including through emails, promotions or contests;
- v. implement online marketing campaigns and targeted advertising, including by utilizing third party ads (subject to your cookie settings and preferences), and to measure the effectiveness of our marketing and targeted advertising;
- vi. conduct surveys or polls, and obtain testimonials;
- vii. process and deliver your genetic testing results;
- viii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

b. Information you choose to share with others

23andMe gives you the ability to share information with other individuals who have 23andMe accounts through (i) our community forums, (ii) relative finding features (e.g., "DNA Relatives"), and (iii) other sharing features (such information is "User Content"). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. For example, we provide the ability to opt-in to our ancestry DNA Relatives Database where your information will be shared with potential relative matches. Alternatively, if you were participating in the DNA Relatives Database you may opt-out or change the visibility of your profile data by visiting your Settings. Also, please note that certain types of your User Content may be viewable by other 23andMe users and once posted, you may not be able to delete or modify such content.

You may decide to disclose your personal information to friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved in the transaction. For example, if you have enabled a 23andMe sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. Likewise, if you are reading this because you have access to the personal information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. It is incumbent upon all users to share personal information and account access only with people they know and trust. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.

c. Information we share with third parties

- i. **General service providers.** We share the information described above in Section 1 with our service providers, as necessary to provide their services to us. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. For example, we work with third-party laboratories and contractors to process and analyze your saliva sample for purposes of generating your Genetic Information.

NOTE: Our service providers act on 23andMe's behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For example, to learn more about our third-party laboratories, click [here](#).

- ii. **"Targeted advertising" service providers.** We permit third party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. Note that we do not share Registration Information, Genetic Information or Self-Reported Information with these advertising partners.
- If you wish to not have this information used for the purpose of serving you targeted ads, you may be able to opt-out of many advertising networks by visiting [here](#) and [here](#) (if you are located in Canada, click [here](#); or if you are located in the European Union click [here](#)). Please note this does not mean that you have opted-out of being served advertising. You will continue to receive generic ads.

For more information about our advertising and marketing practices, please review our [Cookie Policy](#).

- iii. **Aggregate information.** We may share aggregate information with third parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be

- iv. **Information we share with commonly owned entities.** We may share some or all of your information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

d. Information we share with third parties with your consent

23andMe conducts research and works with public, private, and government partnerships to develop research and advance genetic understanding. With your consent, 23andMe may share aggregate or individual-level Genetic Information, Self-Reported Information, and Web Behavior Information with other parties for various purposes.

23andMe Research. "23andMe Research" refers to scientific research conducted by 23andMe or by third parties in collaboration with 23andMe with the goal of advancing genetic knowledge and to create, commercialize, and apply this new knowledge to the improvement of health care. 23andMe Research may study a specific group or population and may build upon existing scientific knowledge. At times, this research is conducted with the intent to publish findings in a peer-reviewed scientific journal, and may be funded by the federal government. 23andMe Research involves the use and analysis of aggregate or individual-level Genetic Information, Self-Reported Information and Web Behavior Information as specified in the Consent Document.

- i. **Consent process for 23andMe Research.** Your Genetic, Self-Reported and Web Behavior Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:
- 23andMe may use individual-level Genetic Information, Self-Reported Information and Web Behavior Information internally at 23andMe for research purposes. 23andMe may use this information to publish the results of the research in peer-reviewed scientific journals. In addition, we may allow select third party research contractors to access your individual level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 - 23andMe may disclose Aggregate Information (including aggregate Genetic Information, Self-Reported Information and Web Behavior Information to third-party research partners in accordance with the terms of our research Consent Document(s). Disclosure of individual-level information to third party research partners will occur only if we have obtained additional explicit consent from you, which may be requested as part of a particular research study. These research partners may include commercial or non-profit organizations that conduct or support scientific and medical research and/or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions. These research partners may publish the results of their research in peer-reviewed scientific journals.
 - When your Genetic Information, Self-Reported Information and/or Web Behavior Information is being used for research purposes (whether internally by 23andMe researchers, shared in aggregate or individual-level form with third parties, or used by third party researchers onsite at 23andMe), it will never be combined with your Registration Information.
- ii. **Withdrawing your Consent.** You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status on your 23andMe Account Settings page, or by sending a request to the Human Protections Administrator at hpa@23andMe.com. 23andMe will not include your Genetic Information, Self-Reported Information or Web Behavior Information in new 23andMe Research occurring after 30 days from the receipt of your request. Any research involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue

- iii. **What happens if you do NOT consent to 23andMe Research?** If you do not complete a Consent Document or any additional consent agreement with 23andMe, your information will not be shared or used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 2.a and 2.b, above), and shared as Aggregate Information that does not identify you as an individual (as described in Section 2.c, above).

e. Disclosures required by law

Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your personal information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<http://grants.nih.gov/grants/policy/coc/index.htm>).

3. Your choices

a. Access to your account

If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information, or update your consent status and biobanking options. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page. If the feature does not enable you to correct or reset information, you may do so by contacting Customer Care. Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties, though we can work with you to prohibit your data from being shared with third parties in the future. We will respond to your request to access within 30 days.

b. Marketing communications

By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by visiting your Account page (go to Account, Settings, Notifications) or by contacting our Privacy Administrator at privacy@23andMe.com. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

For more information about our online advertising, please also refer to Section 2.c.ii above under the heading "Targeted Advertising Service Providers", and also refer to our Cookie Policy.

c. Account closure

If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to Customer Care. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in any applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from ongoing or completed

studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit and compliance purposes.

4. Important Information

a. TRUSTe

23andMe, Inc. has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this website.

In order to view our relationship with TRUSTe please visit the validation page visible by clicking on the TRUSTe seal. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

b. Safe Harbor

23andMe complies with the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union (EU) member countries and Switzerland. 23andMe has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view 23andMe's certification, please visit: <http://www.export.gov/safeharbor/>.

c. Security measures

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

If you have any questions about the security of your personal information, you can contact us at privacy@23andme.com.

d. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

e. Linked websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed for, intended to attract, or directed toward children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

g. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

5. Contact Information

If you have questions about this Privacy Statement, please email 23andMe's Privacy Administrator at privacy@23andme.com, or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on July 14, 2015.**

Read the previous version of the document.



ABOUT

Mission
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FAQ

PARTNER WITH US

API
Affiliates

LEGAL

Terms of Service
Privacy Policy
Family Considerations
Consent Document
Cookie Policy
Ad Choices

CONNECT WITH US

Facebook
 Twitter
 Google Plus
 YouTube

SELECT LOCATION

CAN

Exhibit 17

[welcome](#) [ancestry](#) [research](#) [how it works](#) [buy](#) [help](#) [Q](#)**About 23andMe:**[Our Mission](#)[Our Core Values](#)[Media Center](#)[Policy Forum](#)[Corporate Info](#)[Careers](#)**Who We Are:**[Board of Directors](#)[Leadership Team](#)[Editorial Advisors](#)[Scientific Advisory Board](#)[Research Team](#)

Privacy Highlights



These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to read our full privacy statement.

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our Cookie Policy).
2. We use information in general (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, customers as we reasonably believe permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to.

CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, you consent to sensitive information, such as information about your health, Genetic Information, and Self-Reported Information such as racial and ethnic origin and sexual orientation (where you provide it) being used by us to:

1. analyze and provide you with our Services;
2. analyze and provide you with information about your ancestry;
3. determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. monitor and improve existing products or services that we offer or develop new products and services

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and countries outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third party or to a third party for research purposes without your explicit consent.
3. We give you the ability to share information with other individuals through features like DNA Relatives. You will always need to take a positive action to share your information, for example, DNA Relatives is subject to an opt-in requirement before we share your information with potential relative matches.
4. You may independently decide to disclose your information to friends and/or family members, doctors, health care professionals, or other individuals outside our Services, including through third party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"); always review the privacy policies of third-party apps and services before sharing your information.
5. We may share anonymized and aggregate information with third parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and

6. We will use your information and share it with third parties for scientific research purposes only if you sign a Consent Document. Note that we will disclose your individual-level information only if we obtain additional explicit consent from you.
7. There may be some consequences of using 23andMe Services that you haven't thought of, you should read our guide of the surprising things you may find out from using the service before submitting your saliva sample and personal information.
8. If you have any questions about our privacy practices, please email us at privacy@23andme.com or send a letter to the address provided at the bottom of our full privacy statement.

Full Privacy Statement

This privacy policy applies to www.23andme.com owned and operated by 23andMe, Inc. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when operating our website, mobile apps, products, software and other services (collectively "**Service**" or "**Services**"). The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, such as for marketing and advertising purposes, and (iii) as reasonably necessary to comply with laws and regulations, and to protect the security and safety of our company, employees, customers and others.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third party or to a third party for research purposes without your explicit consent.
3. We understand and respect the sensitive nature of the information you may provide to us, including information about your genetic characteristics, disease conditions, racial and ethnic origin, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third parties. Please see below to learn more about our sharing and consent practices.
4. We are committed to providing a secure and safe environment for our Services.

Please review this Privacy Statement and our Terms of Service. By using our Services, you agree to all of the policies and procedures described in the foregoing documents. 23andMe, Inc. is headquartered at 899 West Evelyn Avenue, Mountain View, CA 94041 and is referred to herein as 23andMe (or "we," "us," "our") and includes all of our commonly owned companies.

1. What information we collect

a. Information you provide directly to us

- i. **Registration Information.** When you register an account with us or purchase our Services, we collect personal information, such as your name, billing and shipping address, payment information (e.g., credit card) and contact information such as your email and phone number.
- ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Where you are disclosing information about a family member, you should make sure that you have permission from the family member to do so.
- iii. **User Content.** Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any post or message you place on 23andMe's community forums.
- iv. **Blogs.** Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or anonymize your personal information from our blog or community forum, contact us at privacy@23andme.com. Please note that whenever you post something publicly, it may sometimes be impossible to remove the information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to

share personal information publicly on our blog, community forums or in any other posting. Note also that you may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review their privacy policy.

- v. **Social Media Features and Widgets.** Our Web site includes Social Media Features, such as the Facebook Like or Share button and Widgets, and the LinkedIn Open ID application ("Features"). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The data we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
- vi. **Testimonials.** We may post customer testimonials either on our website or in other online or offline formats. Customer testimonials may contain personal information and it is our policy to request consent from customers in advance of using testimonials. If you wish to update or delete your testimonial, you can contact us at privacy@23andme.com.
- vii. **Referral Information and Sharing.** When you refer a person to 23andMe or choose to share results information with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for 23andMe to communicate (e.g., via email) with him or her. For more information on our referral program, see here.
- viii. **Address books.** If you choose to use your computer's or mobile device's address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.
- ix. **Third-party services (e.g., social media).** If you use a third-party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.
- x. **Gifts.** If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement, our Terms of Service, and if applicable, Consent Document, his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.
- xi. **Customer service.** When you contact our Customer Care center or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyze and improve our Services.

b. Information related to our genetic testing services

1. **Saliva sample and bio-banking.** To use our genetic testing services, you must purchase, or receive as a gift, a 23andMe Personal Genome Service® testing kit, register an online account, and ship your saliva sample to our third-party laboratory. Once received, your saliva sample will be identified by its unique barcode, along with your gender and your date of birth. The barcode label identifies you to us but not to our third-party laboratory. Unless you choose to store your sample with 23andMe (called "bio-banking"), your saliva samples and DNA are destroyed after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples.
2. **Genetic Information.** Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the 23andMe Results information reported to you as part of our Services, and may be used for other purposes, as outlined in Section 2 below.

Web Behavior Information. We and our third party partners use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our products and services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. We and our third party partners do not use your sensitive information, such as Genetic Information and Self-Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on 23andMe, please read our Cookie Policy.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

Because 23andMe relies on third party ad networks who may track you across websites over time for advertising purposes, we are not able to respond to your selection of the “Do Not Track” option provided by your browser. We cannot advise on whether your selection of “Do Not Track” option will have any effect on the collection of cookie information by the third parties who collect such cookie information on our site. Please see Section 2.c.ii, below, to learn more about our third party advertising partners, and visit our Cookie Policy to learn more about tracking cookies.

Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use Flash Cookies (Local Shared Objects) to collect and store information. To learn how to manage privacy and storage settings for Flash cookies click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#1

d. Other Types of Information.

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement, as needed.

2. How we use and share information

23andMe will use and share your personal information with third parties only in the ways that are described in this privacy policy.

a. Using information to provide, analyze and improve our Services

We use the information described above in Section 1 to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with other commitments in this privacy statement, to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
- ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. conduct analytics to improve and enhance our Services;
- iv. offer new products or services to you, including through emails, promotions or contests;
- v. implement online marketing campaigns and targeted advertising, including by utilizing third party ads (subject to your cookie settings and preferences), and to measure the effectiveness of our marketing and targeted advertising;
- vi. conduct surveys or polls, and obtain testimonials;
- vii. process and deliver your genetic testing results;
- viii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

b. Information you choose to share with others

23andMe gives you the ability to share information with other individuals who have 23andMe accounts through (i) our community forums, (ii) relative finding features (e.g., “DNA Relatives”), and (iii) other sharing features (such information is “User Content”). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. For example, we provide the ability to opt-in to our ancestry DNA Relatives Database where your information will be shared with potential relative matches. Alternatively, if you were participating in the DNA Relatives Database you may opt-out or change the visibility of your profile data by visiting your Settings. Also, please note that certain types of your User Content may be viewable by other 23andMe users and once posted, you may not be able to delete or modify such content.

You may decide to disclose your personal information to friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface (“API”). These third parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved in the transaction. For example, if you have enabled a 23andMe sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. Likewise, if you are reading this because you have access to the personal information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. It is incumbent upon all users to share personal information and account access only with people they know and trust. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.

c. Information we share with third parties

- i. **General service providers.** We share the information described above in Section 1 with our service providers, as necessary to provide their services to us. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. For example, we work with third-party laboratories and contractors to process and analyze your saliva sample for purposes of generating your Genetic Information.

NOTE: Our service providers act on 23andMe’s behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

For example, to learn more about our third-party laboratories, [click here](#).

- ii. **“Targeted advertising” service providers.** We permit third party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements (“ads”) to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser’s or device’s visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. Note that we do not share Registration Information, Genetic Information or Self-Reported Information with these advertising partners. If you wish to not have this information used for the purpose of serving you targeted ads, you may be able to opt-out of many advertising networks by visiting [here](#) and [here](#) (if you are located in Canada, [click here](#); or if you are located in the European Union [click here](#)). Please note this does not mean that you have opted-out of being served advertising. You will continue to receive generic ads.

For more information about our advertising and marketing practices, please review our [Cookie Policy](#).

- iii. **Aggregate information.** We may share aggregate information with third parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be

- iv. **Information we share with commonly owned entities.** We may share some or all of your information with other companies under common ownership or control of 23andMe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

d. Information we share with third parties with your consent

23andMe conducts research and works with public, private, and government partnerships to develop research and advance genetic understanding. With your consent, 23andMe may share aggregate or individual-level Genetic Information, Self-Reported Information, and Web Behavior Information with other parties for various purposes.

23andMe Research. "23andMe Research" refers to scientific research conducted by 23andMe or by third parties in collaboration with 23andMe with the goal of advancing genetic knowledge and to create, commercialize, and apply this new knowledge to the improvement of health care. 23andMe Research may study a specific group or population and may build upon existing scientific knowledge. At times, this research is conducted with the intent to publish findings in a peer-reviewed scientific journal, and may be funded by the federal government. 23andMe Research involves the use and analysis of aggregate or individual-level Genetic Information, Self-Reported Information and Web Behavior Information as specified in the Consent Document.

- i. **Consent process for 23andMe Research.** Your Genetic, Self-Reported and Web Behavior Information may be used for 23andMe Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:
- 23andMe may use individual-level Genetic Information, Self-Reported Information and Web Behavior Information internally at 23andMe for research purposes. 23andMe may use this information to publish the results of the research in peer-reviewed scientific journals. In addition, we may allow select third party research contractors to access your individual level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 - 23andMe may disclose Aggregate Information (including aggregate Genetic Information, Self-Reported Information and Web Behavior Information to third-party research partners in accordance with the terms of our research Consent Document(s). Disclosure of individual-level information to third party research partners will occur only if we have obtained additional explicit consent from you, which may be requested as part of a particular research study. These research partners may include commercial or non-profit organizations that conduct or support scientific and medical research and/or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions. These research partners may publish the results of their research in peer-reviewed scientific journals.
 - When your Genetic Information, Self-Reported Information and/or Web Behavior Information is being used for research purposes (whether internally by 23andMe researchers, shared in aggregate or individual-level form with third parties, or used by third party researchers onsite at 23andMe), it will never be combined with your Registration Information.
- ii. **Withdrawing your Consent.** You may withdraw your consent to participate in 23andMe Research at any time by changing your consent status on your 23andMe Account Settings page, or by sending a request to the Human Protections Administrator at hpa@23andMe.com. 23andMe will not include your Genetic Information, Self-Reported Information or Web Behavior Information in new 23andMe Research occurring after 30 days from the receipt of your request. Any research involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue

- iii. **What happens if you do NOT consent to 23andMe Research?** If you do not complete a Consent Document or any additional consent agreement with 23andMe, your information will not be shared or used for 23andMe Research. However, your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 2.a and 2.b, above), and shared as Aggregate Information that does not identify you as an individual (as described in Section 2.c, above).

e. Disclosures required by law

Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. 23andMe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public.

NOTE: If you are participating in 23andMe Research, 23andMe will withhold disclosure of your personal information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that 23andMe has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<http://grants.nih.gov/grants/policy/coc/index.htm>).

3. Your choices

a. Access to your account

If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information, or update your consent status and biobanking options. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page. If the feature does not enable you to correct or reset information, you may do so by contacting Customer Care. Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties, though we can work with you to prohibit your data from being shared with third parties in the future. We will respond to your request to access within 30 days.

b. Marketing communications

By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by visiting your Account page (go to Account, Settings, Notifications) or by contacting our Privacy Administrator at privacy@23andMe.com. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

For more information about our online advertising, please also refer to Section 2.c.ii above under the heading "Targeted Advertising Service Providers", and also refer to our Cookie Policy.

c. Account closure

If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to Customer Care. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in any applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research cannot be removed from ongoing or

completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit and compliance purposes.

4. Important Information

a. TRUSTe

23andMe, Inc. has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this Web site, www.23andme.com and through our mobile application.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe here.

b. Safe Harbor

23andMe complies with the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union (EU) member countries and Switzerland. 23andMe has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view 23andMe's certification, please visit: <http://www.export.gov/safeharbor/>.

c. Security measures

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in the United States or any other country in which 23andMe or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

d. Business transactions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

e. Linked websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your information to organizations operating such linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

f. Children's privacy

g. **Changes to this Privacy Statement**

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

5. Contact Information

If you have questions about this Privacy Statement, please email 23andMe's Privacy Administrator at privacy@23andme.com, or send a letter to:

Privacy Administrator
23andMe, Inc.
899 West Evelyn Avenue
Mountain View, CA 94041
1.800.239.5230

***This Privacy Statement was last updated on Nov 13, 2014.**
Read the previous version of the document.



ABOUT

Mission
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PARTNER WITH US

API
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LEGAL

Terms of Service
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Family Considerations
Consent Document
Cookie Policy
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CONNECT WITH US

Facebook
 Twitter
 Google Plus
 YouTube

SELECT LOCATION

CAN

Exhibit 18

welcome

ancestry

how it works

buy

search

help

23andMe provides ancestry-related genetic reports and uninterpreted raw genetic data. We no longer offer our health-related genetic reports. If you are a current customer please go to the [health page](#) for more information. [Close alert](#).

About 23andMe

[Team 23andMe](#)[Media Center](#)[Core Values](#)[Policy Forum](#)[Corporate Info](#)[Careers](#)

Who we are

[Board of Directors](#)[Leadership Team](#)[Research Team](#)[Editorial Advisors](#)[Scientific Advisory Board](#)

Privacy Highlights

Summary

- 23andMe respects your privacy. 23andMe does not sell, lease, or rent your individual-level Personal Information without explicit consent.
- We are committed to providing a secure, user-controlled environment for our Services.
- This summary provides highlights of our full Privacy Statement and applies to 23andMe's collection and handling of your Personal Information. We encourage you to read the full Statement.

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andMe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andMe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andMe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service"** or **"Services"** means 23andMe's products, software, services, mobile application, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

Which Personal Information We Collect

"Personal Information" is information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information (see [Terms of Service](#) for a full list of related definitions):

- **"Registration Information"** is the information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
- **"Genetic Information"** is information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, and assignees; or otherwise processed by and/or contributed to 23andMe.
- **"Self-Reported Information"** is all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account. Self-Reported Information is included in 23andMe Research only if you have given consent as described in the applicable Consent Document.

- **"User Content"** is all information, data, text, software, music, audio, photographs, graphics, video, posts, e-mails, or other materials - *other than* Genetic Information and Self-Reported Information - generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
- **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.
- **"Referral Information"** is information that you provide when referring 23andMe Services to your friends and contacts as part of a 23andMe referral program.

How We Use Your Information

- 23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your consent, conducting 23andMe Research.
- We use Registration Information to enable your purchase, inform you when your Genetic Information is available to you, provide you with customer service, manage our Services, and authenticate your website visits and usage.
- We may disclose to third parties, and/or use in our Services, **"Aggregated Genetic and Self-Reported Information"**, which is Genetic and Self-Reported Information that has been stripped of Registration Information and combined with data from a number of other users sufficient to minimize the possibility of exposing individual-level information while still providing scientific evidence. If you have given consent for your Genetic and Self-Reported Information to be used in 23andMe Research as described in the applicable Consent Document, we may include such information in Aggregated Genetic and Self-Reported Information intended to be published in peer-reviewed scientific journals. If you have given consent to participate in 23andMe Research, we may also allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines. Similarly, if you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use. If you do not give consent for your Genetic and Self-Reported Information to be used in 23andMe Research or your individual-level Genetic and Self-Reported Information to be used in the Research Portal, we may still use your Genetic and/or Self-Reported Information for R&D purposes as described above, which may include disclosure of Aggregated Genetic and Self-Reported Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.
- Except as otherwise set forth herein, we will never release your individual-level Genetic and/or Self-Reported Information to a third party without asking for and receiving your explicit consent to do so, unless required by law.
- We use Web Behavior Information to track and monitor aggregate usage of our website, for R&D, for quality control, to improve our Services, and/or to target advertising for our products and services, and if you have given consent to participate in 23andMe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andMe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andMe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or

- We give you the ability to share your Genetic Information with other 23andMe customers through sharing features.

Information Disclosure

- We will not disclose your individual-level Personal Information to any third party, except under the following circumstances:
 - Partners or service providers (e.g. our contracted genotyping laboratory or credit card processors) use and/or store the information in order to provide you with 23andMe's Services.
 - If you have consented for research, research contractors may access your individual-level Genetic and Self-Reported Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 - If you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use.
 - We are required to do so by law or we do so in coordination with regulatory authorities (see the section below titled "Information Disclosure Required By Law").
 - You have provided explicit consent for us to do so.

Your Choices

- Contribution of Personal Information other than Registration Information is voluntary and permission-based.
- Whether to give consent for 23andMe to use your Genetic and Self-Reported Information for 23andMe Research or the Research Portal is voluntary.
- Providing Self-Reported Information through surveys, forms, or features is voluntary.
- At your written request we will close your account. As a result, all Genetic Information will be removed from the account and will no longer be accessible. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after account closure. We cannot remove Genetic Information that has previously been used for published research or shared with external collaborators before account closure. (See the section below titled "Account Closure and Correction of Personal Information".)

Additional Information

- We encourage you to read 23andMe's full Privacy Statement.

How to Contact Us

Questions about this Summary, our Privacy Statement, or about 23andMe's handling of your Personal Information may be emailed to privacy@23andme.com, or sent to:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

Full Privacy Statement

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043, and all affiliates and entities under

- **"23andMe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andMe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andMe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service" or "Services"** means 23andMe's products, software, services, mobile application, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

23andMe Respects Your Privacy

23andMe recognizes the importance of privacy and respects your desire to store and access your information in a private and secure manner.

This Privacy Statement for www.23andme.com and our mobile application (TwentyThree) is intended to make you aware of how we handle your Personal Information. We are committed to providing you a secure, user-controlled environment for the use of our Services. At the same time, you share responsibility for maintaining privacy and security - for example, by keeping your password secure.

We encourage you to familiarize yourself with this Privacy Statement. Our Consent Form and Terms of Service explain that, by using our website and signing up for our service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

23andMe has been awarded TRUSTe's Privacy Seal signifying that this privacy statement and practices have been reviewed by TRUSTe for compliance with TRUSTe's program requirements including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program covers only information that is collected through this Web site, www.23andme.com. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy statement or practices, please contact us at privacy@23andme.com or Privacy Administrator, 23andMe, Inc. 1390 Shorebird Way, Mountain View, CA 94043. If you are not satisfied with our response you can contact TRUSTe here.

Your Personal Information

In the course of your relationship with 23andMe, we collect several types of Personal Information. **"Personal Information"** is information that could be used to identify you, either alone or in combination with other information. We collect such information from you when you purchase our Services, create a personal account, complete surveys and forms, and/or when you communicate with us or request information from us. Personal Information collected online or through our mobile application can be combined with Personal Information collected offline. We collect six primary types of Personal Information through our Service and website.

1. **"Registration Information"** is information that we collect from you when you purchase or sign up for our Services. Examples of such information include your

- name, credit card information, billing and shipping addresses, and contact information, such as email address and telephone number.
2. **"Genetic Information"** consists of your genotype, e.g. the As, Ts, Cs, and Gs at particular locations in your genome. Genetic Information is generated when you purchase 23andMe's Service and your saliva sample is analyzed and processed or you otherwise contribute or access your Genetic Information through our Services. Our instructions for sample collection and shipment clearly require you to send only your saliva sample to our third-party laboratory labeled with the unique barcode and no other identifier. The unique barcode identifies you to us but not to the laboratory. We are also required to provide sex and date of birth or age to the laboratory pursuant to Clinical Laboratory Improvement Amendments (CLIA) requirements. No other Personal Information is required for the analysis. To protect your privacy, receiving personnel at the laboratory will remove and discard any identifying information (e.g. name, address) included with saliva samples before testing personnel receive the samples for genotyping. Receiving personnel do not perform testing, and testing personnel only handle samples labeled with the unique barcode. Unless you choose to store your sample, DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but labeled only with a sample barcode. The laboratory conducting DNA extraction and analysis does not have access to your name, other Registration Information, or any other Personal Information except your sex and date of birth or age, as required by CLIA.
 3. **"Self-Reported Information"** includes information you provide to us, including but not limited to information about your disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), personal traits (e.g., eye color, height), ethnicity, and/or family history (e.g. similar information about family members). We collect this information from you if and when you enter the information into surveys, forms, or features while signed in to your account. Self-Reported Information is included in 23andMe Research only if you have given consent as described in the applicable Consent Document.
 4. **"User Content"** is all information *other than* Genetic Information or Self-Reported Information generated by users of 23andMe Services and transmitted, whether publicly or privately, to 23andMe. User Content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, User Content includes posts made to the 23andMe community forums or emails to Customer Support. User Content *does not* include Genetic Information or Self-Reported Information.
 5. **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.
 6. **"Referral Information"** is information that you provide when referring 23andMe Services to your friends and contacts as part of a 23andMe referral program. This information can include your name, your email address, and the name and email address of the person you are referring our Services to. If you chose to allow 23andMe to access your address book on your computer or mobile device, we will collect the contact information of the friends you select to enter the referral program. When you make referrals using a social network such as Facebook or Twitter it may also include information from your profile that is made available to 23andMe when we connect to your social network to post the referral on your behalf. The information that 23andMe is provided during this process varies depending on the social network and your privacy settings, but can include information such as your name, profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers and any other information you have permitted the social network to share with third parties. Additionally, we and our third party partner who administers our

How We Use Personal Information

23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your authorization, conducting 23andMe Research.

23andMe may provide your Personal Information to our third-party service providers, which are companies and people that help us provide, understand and improve our Services. For example, we may use service providers to help host our website, run our mobile application, send emails, implement our marketing campaigns, measure the effectiveness of our advertising, conduct surveys or polls, obtain testimonials, or otherwise help us run or improve our business. In all instances, our service providers act on 23andMe's behalf and we require by contract that they protect the confidentiality of any information they receive from us.

We do not ask you for, access, or track any location-based information from your mobile device at any time while downloading or using our mobile application or Services. Below we will describe the additional ways in which we use subsets of Personal Information.

How We Use Registration Information

We use your Registration Information to authenticate your website and mobile application visits and usage; to enable your purchase; to communicate with you about information, services, and products that you have requested; and to manage and improve our website, mobile application, software, and Services. We give you the opportunity to opt out of optional communications, either through our Service or by contacting our Privacy Administrator at privacy@23andme.com.

How We Use Genetic and Self-Reported Information

We use your Genetic and Self-Reported Information to provide you with 23andMe Services, customize the user experience, and enhance our features. **IF** you allow sharing, Genetic and Self-Reported Information may be displayed in other users' accounts. Self-Reported Information is used to customize your user experience - for example, by adjusting reports of genetic risk to account for your reported behaviors or environmental exposures.

If, and only if, you have given consent to participate in 23andMe Research as described in the applicable Consent Document, we may include your Genetic Information and Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to third parties for the purpose of publication in a peer-reviewed scientific journal. 23andMe Research is intended to advance genetic knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health care. Towards the same goals, if you have given consent to participate in 23andMe Research, we may allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines. If, and only if, you have given consent to use of your individual-level data in the Research Portal, we may provide your individual-level Genetic Information and/or Self-Reported Information to qualified researchers for the purpose of scientific research and publication in a peer-reviewed

If you do not give your consent to participate in 23andMe Research, 23andMe may still use your Genetic and Self-Reported Information for purposes such as quality control or other R&D activities. Genetic and Self-Reported Information used for such purposes may be included in Aggregated Genetic and Self-Reported Information disclosed to third-party research partners who will not publish the information in a peer-reviewed scientific journal. Research partners may include commercial or non-profit organizations that conduct or support scientific/medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

How We Use User Content and Web Behavior Information

23andMe uses User Content to provide our Services and improve the overall user experience. For example, posts made to the 23andMe community forums are publicly displayed to other users. By submitting, posting, or displaying User Content, you give 23andMe a non-exclusive license to use any User Content that you submit, post, or display on or through the Services, as further described in Section 13 of the Terms of Service. 23andMe may make such User Content available to other companies, organizations, or individuals with whom 23andMe has relationships, and to use such User Content in connection with the provision of those services. 23andMe, in performing the required technical steps to provide the Services to our users, may also (a) transmit or distribute your User Content over various public networks and in various media; and (b) make such changes to your content as are necessary to conform and adapt that content to the technical requirements of connecting networks, devices, services, or media.

Web Behavior Information is collected through log files, cookies, and web beacon technology during a visit to the 23andMe website. Web Behavior Information is used to improve our Services and the overall user experience, and if you have given consent to participate in 23andMe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andMe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andMe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.

Log Files. When users visit our website or use our mobile application, 23andMe gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e. a list of pages or URLs visited). This information may be linked to a particular user's profile ID or order number. We use this information to analyze trends, administer the site, track users' movements around the site, identify and resolve issues, and gather demographic information about our user base as a whole.

Cookies. The 23andMe website also uses cookies. For information about cookies and how they are used on 23andMe's website, please read our Cookie Policy.

Web Beacons. A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place cookies and web beacons on our website, in our emails, and in our advertisements that appear on other websites or in emails sent by others that mention our products and services with our permission. The purpose of our web

beacons is to support operation of our website and to offer additional products and services through targeted advertisements. For example, we may use beacons to determine when someone views a web page, count how many individuals visit our website after clicking advertisements placed on other websites, or count how many people have purchased products from our website after viewing an advertisement we placed. Web beacons may also help us determine the effectiveness of an email campaign because the beacons can count the number of individuals who open an email or forward it to others. We use this Web Behavior Information to better tailor our marketing to you and may also use this information to customize content on our website, enable a shopping cart, or conduct research. Third parties only collect anonymous Web Behavior Information through the use of web beacons, allowing statistical analysis relating to the performance of our advertising.

If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information Sharing

23andMe gives you the ability to connect with other individuals who have 23andMe accounts through our community forums, relative finding features, and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with 23andMe, any part of your Personal Information to friends and/or family members, groups of individuals, third-party service providers, doctors or other health care professionals, and/or other individuals. We recommend that you make such choices carefully.

Personal Information, once released or shared, can be difficult to contain. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with a third party. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of that person. It is incumbent upon customers to share Personal Information only with people they know and trust. Users with multi-profile accounts should use caution in setting profile-level privacy settings.

Ordering 23andMe Services as a Gift

If you provide us personal information about others, or if others give us your information for purposes of ordering the Personal Genome Service as a gift, we will only use that information for the specific reason for which it was provided to us, provided that once a gift recipient registers for his or her Services and agrees to our TOS, Privacy Statement and if applicable, Consent Form, his or her information will be used consistent with this Privacy Statement and those agreements.

Sharing Discoveries

If you provide us personal information about others within the mobile application for the purposes of sharing a 23andMe discovery we will use the email address you provide, or access your contacts list if you choose to allow us to do so, to send a one-time email with the discovery and an invitation inviting him or her to visit the site. 23andMe does not store this information.

If you provide us personal information about others on our website for the purposes of sharing a 23andMe discovery we will use the email address you provide and any additional information you provide to send a one-time email with the discovery and an invitation inviting him or her to visit the site. 23andMe stores this information for the sole purpose of sending this one-time email. Your friend may contact Customer Care at customercare.23andme.com to request that we remove this information from our database.

If you take part in a 23andMe referral program to promote 23andMe Services to your friends we will use the Referral Information you provide for the sole purpose of sending these referral emails. If as part of the referral program you provide us with a friend's email address, you confirm that your friend has provided you with his or her consent to be sent the referral email. We will let your friend know that you asked us to contact them. Additionally, we may collect information from you and your friends through the use of cookies and other technology, so we can monitor the success of our referral program and keep track of friends you refer who may sign up for our services and to credit you with any benefit that is available under our referral program. For information about cookies and how they are used on 23andMe's website, please read our Cookie Policy. If your friend or contact has any questions about our use of this information then they may contact Customer Care at customercare.23andme.com.

Information Disclosure

We do not sell, lease, or rent your individual-level Personal Information without your explicit consent. As a general rule, 23andMe will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- Partners or service providers (e.g. credit card processors or our contracted genotyping laboratory) process and/or store the information in order to help us provide, understand or improve 23andMe's Services.
- If you have consented for research, research contractors may access your individual-level Genetic and Self-Reported Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
- If you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use.
- We are required to do so by law or we do so in coordination with regulatory authorities (see the section below titled "Information Disclosure Required By Law").
- You have provided explicit consent for us to do so.

23andMe may disclose Personal Information for the following reasons:

- **23andMe Research.** 23andMe may disclose Aggregated Genetic and Self-Reported Information intended to be published in a peer-reviewed scientific journal to research collaborators or as a result of publication. You may give/withhold consent for your data to be used in 23andMe Research when viewing the applicable Consent Document during the process of claiming your Genetic Information into your account. You may also give consent or change your global consent status through your Account Settings at any subsequent time which will be effective thirty (30) days thereafter; however, we cannot withdraw information that has previously been used for published research or shared with external collaborators prior to your request to withdraw consent. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after your withdrawal of consent.
- **Contact information.** 23andMe will ask for and require your explicit consent to allow partner organizations (not including service providers) direct access to your Registration Information.
- **Commercial partnerships.** 23andMe may enter into commercial arrangements to enable partners to provide our Service to their customers and/or to provide you access to their products and services. We will not provide any individual-level Personal Information to these commercial partners without your explicit consent. 23andMe may include your Genetic and/or Self-Reported Information in Aggregated

- **Family Tree Health Mode.** If you opt to use 23andMe's collaborative Family Tree Health Mode feature, the FTHM terms of service apply.

Information Disclosure Required By Law

Under certain circumstances Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. You acknowledge and agree that 23andMe is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe TOS; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. In the event we are required by law to make a disclosure, we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order. As relates to 23andMe's IRB-approved research, 23andMe has obtained a Certificate of Confidentiality from the National Institutes of Health. If you are participating in 23andMe's IRB-approved research, 23andMe will withhold disclosure of your Personal Information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with the Certificate of Confidentiality. There are limits to what the Certificate of Confidentiality covers (for more information, please visit the Certificates of Confidentiality Kiosk).

Linked Websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your Personal Information to organizations operating linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

Customer Testimonials

We post testimonials from consenting customers on our web site, and may use testimonials in other formats consistent with consent received. Customer testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Your Choices Regarding Your Information

You can opt-out of receiving certain messages or notifications from us by logging into your 23andMe account and changing Notifications Settings or by contacting our Privacy Administrator at privacy@23andme.com. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

At your written request we will close your account and will remove Genetic Information from your account. See the section below titled "Account Closure and Correction of Personal Information."

You can use the browser that you are viewing this website with to enable, disable, or delete cookies. Please note that if you set your browser to disable cookies, you may not be able to access secure areas of the website and other parts of the website may also not work properly. To find out more about cookies and how to manage them, please review our Cookie Policy.

Account Closure and Correction of Personal Information

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Care. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in the applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research or the Research Portal will not be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update your Registration Information via your Account Settings page. You may also correct or reset Self-Reported Information entered into a survey, form, or feature from within your account on the surveys page. Locate the name of the survey you wish to update and click on the review or update button.

Newsletter and Email Communications

You may choose to stop or start receiving our newsletter or marketing emails by changing your notifications settings in your account (go to Account, Settings, Notifications) or you can contact us at privacy@23andme.com.

Children's Privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed or intended to attract children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide Self-Reported Information on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

Security

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of reasonable physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

Changes to This Privacy Statement

This Privacy Statement was last updated March 25, 2013. Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes.

Contact Information

If you have questions about this statement, please email 23andMe's Privacy Administrator at privacy@23andme.com. You can also contact us at this address if you have a question about 23andMe's handling of your information:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043
[Read the previous version of the document.](#)



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LEGAL

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Exhibit 19

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Summary

- 23andMe respects your privacy. 23andMe does not sell, lease, or rent your individual-level Personal Information without explicit consent.
- We are committed to providing a secure, user-controlled environment for our Services.
- This summary provides highlights of our full [Privacy Statement](#) and applies to 23andMe's collection and handling of your Personal Information. We encourage you to read the full Statement.

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andWe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andWe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andWe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service"** or **"Services"** means 23andMe's products, software, services, mobile application, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

Which Personal Information We Collect

"Personal Information" is information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information (see [Terms of Service](#) for a full list of related definitions):

- **"Registration Information"** is the information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
- **"Genetic Information"** is information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, and assignees; or otherwise processed by and/or contributed to 23andMe.
- **"Self-Reported Information"** is all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account. Self-Reported Information is included in 23andWe Research only if you have given consent as described in the applicable Consent Document.
- **"User Content"** is all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - *other than* Genetic Information and Self-Reported Information - generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
- **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Your Information

- 23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your consent, conducting 23andWe Research.
- We use Registration Information to enable your purchase, inform you when your Genetic Information is available to you, provide you with customer service, manage our Services, and authenticate your website visits and usage.
- We may disclose to third parties, and/or use in our Services, **"Aggregated Genetic and Self-Reported Information"**, which is Genetic and Self-Reported Information that has been stripped of Registration Information and combined with data from a number of other users sufficient to minimize the possibility of exposing individual-level information while still providing scientific evidence. If you have given consent for your Genetic and Self-Reported Information to be used in 23andWe Research as described in the applicable Consent Document, we may include such information in Aggregated Genetic and Self-Reported Information intended to be published in peer-reviewed scientific journals. If you have given consent to participate in 23andWe Research, we may also allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines. Similarly, if you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use. If you do not give consent for your Genetic and Self-

Reported Information to be used in 23andMe Research or your individual-level Genetic and Self-Reported Information to be used in the Research Portal, we may still use your Genetic and/or Self-Reported Information for R&D purposes as described above, which may include disclosure of Aggregated Genetic and Self-Reported Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.

- Except as otherwise set forth herein, we will never release your individual-level Genetic and/or Self-Reported Information to a third party without asking for and receiving your explicit consent to do so, unless required by law.
- We use Web Behavior Information to track and monitor aggregate usage of our website, for R&D, for quality control, to improve our Services, and/or to target advertising for our products and services, and if you have given consent to participate in 23andMe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andMe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andMe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.
- We give you the ability to share your Genetic Information with other 23andMe customers through sharing features.

Information Disclosure

- We will not disclose your individual-level Personal Information to any third party, except under the following circumstances:
 - Partners or service providers (e.g. our contracted genotyping laboratory or credit card processors) use and/or store the information in order to provide you with 23andMe's Services.
 - If you have consented for research, research contractors may access your individual-level Genetic and Self-Reported Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 - If you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use.
 - We are required to do so by law or we do so in coordination with regulatory authorities (see the section below titled "Information Disclosure Required By Law").
 - You have provided explicit consent for us to do so.

Your Choices

- Contribution of Personal Information other than Registration Information is voluntary and permission-based.
- Whether to give consent for 23andMe to use your Genetic and Self-Reported Information for 23andMe Research or the Research Portal is voluntary.
- Providing Self-Reported Information through surveys, forms, or features is voluntary.
- At your written request we will close your account. As a result, all Genetic Information will be removed from the account and will no longer be accessible. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after account closure. We cannot remove Genetic Information that has previously been used for published research or shared with external collaborators before account closure. (See the section below titled "Account Closure and Correction of Personal Information".)

Additional Information

- We encourage you to read 23andMe's full [Privacy Statement](#).

How to Contact Us

Questions about this Summary, our Privacy Statement, or about 23andMe's handling of your Personal Information may be emailed to privacy@23andme.com, or sent to:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

full privacy statement

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andMe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andMe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andMe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service" or "Services"** means 23andMe's products, software, services, mobile application, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

23andMe recognizes the importance of privacy and respects your desire to store and access your information in a private and secure manner.

This Privacy Statement for www.23andme.com and our mobile application (TwentyThree) is intended to make you aware of how we handle your Personal Information. We are committed to providing you a secure, user-controlled environment for the use of our Services. At the same time, you share responsibility for maintaining privacy and security - for example, by keeping your password secure.

We encourage you to familiarize yourself with this Privacy Statement. Our [Consent Form](#) and [Terms of Service](#) explain that, by using our website and signing up for our service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

23andMe has been awarded TRUSTe's Privacy Seal signifying that this privacy statement and practices have been reviewed by TRUSTe for compliance with [TRUSTe's program requirements](#) including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program covers only information that is collected through this Web site, www.23andme.com. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy statement or practices, please contact us at privacy@23andme.com or Privacy Administrator, 23andMe, Inc. 1390 Shorebird Way, Mountain View, CA 94043. If you are not satisfied with our response you can contact [TRUSTe here](#).

Your Personal Information

In the course of your relationship with 23andMe, we collect several types of Personal Information. **"Personal Information"** is information that could be used to identify you, either alone or in combination with other information. We collect such information from you when you purchase our Services, create a personal account, complete surveys and forms, and/or when you communicate with us or request information from us. Personal Information collected online or through our mobile application can be combined with Personal Information collected offline. We collect five primary types of Personal Information through our Service and website.

1. **"Registration Information"** is information that we collect from you when you purchase or sign up for our Services. Examples of such information include your name, credit card information, billing and shipping addresses, and contact information, such as email address and telephone number.
2. **"Genetic Information"** consists of your genotype, e.g. the As, Ts, Cs, and Gs at particular locations in your genome. Genetic Information is generated when you purchase 23andMe's Service and your saliva sample is analyzed and processed or you otherwise contribute or access your Genetic Information through our Services. Our instructions for sample collection and shipment clearly require you to send only your saliva sample to our third-party laboratory labeled with the unique barcode and no other identifier. The unique barcode identifies you to us but not to the laboratory. We are also required to provide sex and date of birth or age to the laboratory pursuant to Clinical Laboratory Improvement Amendments (CLIA) requirements. No other Personal Information is required for the analysis. To protect your privacy, receiving personnel at the laboratory will remove and discard any identifying information (e.g. name, address) included with saliva samples before testing personnel receive the samples for genotyping. Receiving personnel do not perform testing, and testing personnel only handle samples labeled with the unique barcode. Unless you choose to store your sample, DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but labeled only with a sample barcode. The laboratory conducting DNA extraction and analysis does not have access to your name, other Registration Information, or any other Personal Information except your sex and date of birth or age, as required by CLIA.
3. **"Self-Reported Information"** includes information you provide to us, including but not limited to information about your disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), personal traits (e.g., eye color, height), ethnicity, and/or family history (e.g. similar information about family members). We collect this information from you if and when you enter the information into surveys, forms, or features while signed in to your account. Self-Reported Information is included in 23andMe Research only you have given consent as described in the applicable Consent Document.
4. **"User Content"** is all information *other than* Genetic Information or Self-Reported Information generated by users of 23andMe Services and transmitted, whether publicly or privately, to 23andMe. User Content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, User Content includes posts made to the 23andMe community forums or emails to Customer Support. User Content *does not* include Genetic Information or Self-Reported Information.
5. **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Personal Information

23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your authorization, conducting 23andMe Research. We do not ask you for, access, or track any location-based information from your mobile device at any time

while downloading or using our mobile application or Services. Below we will describe the additional ways in which we use subsets of Personal Information.

How We Use Registration Information

We use your Registration Information to authenticate your website and mobile application visits and usage; to enable your purchase; to communicate with you about information, services, and products that you have requested; and to manage and improve our website, mobile application, software, and Services. We give you the opportunity to opt out of optional communications, either through our Service or by contacting our Privacy Administrator at privacy@23andme.com.

How We Use Genetic and Self-Reported Information

We use your Genetic and Self-Reported Information to provide you with 23andMe Services, customize the user experience, and enhance our features. **IF** you allow sharing, Genetic and Self-Reported Information may be displayed in other users' accounts. Self-Reported Information is used to customize your user experience - for example, by adjusting reports of genetic risk to account for your reported behaviors or environmental exposures.

If, and only if, you have given consent to participate in 23andWe Research as described in the applicable Consent Document, we may include your Genetic Information and Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to third parties for the purpose of publication in a peer-reviewed scientific journal. 23andWe Research is intended to advance genetic knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health care. Towards the same goals, if you have given consent to participate in 23andWe Research, we may allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines. If, and only if, you have given consent to use of your individual-level data in the Research Portal, we may provide your individual-level Genetic Information and/or Self-Reported Information to qualified researchers for the purpose of scientific research and publication in a peer-reviewed scientific journal, which could also lead to commercial uses of such information. When your Genetic Information and/or Self-Reported Information is being used for research purposes, pursuant to 23andWe Research, research onsite at 23andMe or via the Research Portal, it will never be combined with your Registration Information.

If you do not give your consent to participate in 23andWe Research, 23andMe may still use your Genetic and Self-Reported Information for purposes such as quality control or other R&D activities. Genetic and Self-Reported Information used for such purposes may be included in Aggregated Genetic and Self-Reported Information disclosed to third-party research partners who will not publish the information in a peer-reviewed scientific journal. Research partners may include commercial or non-profit organizations that conduct or support scientific/medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

How We Use User Content and Web Behavior Information

23andMe uses User Content to provide our Services and improve the overall user experience. For example, posts made to the 23andMe community forums are publicly displayed to other users. By submitting, posting, or displaying User Content, you give 23andMe a non-exclusive license to use any User Content that you submit, post, or display on or through the Services, as further described in Section 13 of the [Terms of Service](#). 23andMe may make such User Content available to other companies, organizations, or individuals with whom 23andMe has relationships, and to use such User Content in connection with the provision of those services. 23andMe, in performing the required technical steps to provide the Services to our users, may also (a) transmit or distribute your User Content over various public networks and in various media; and (b) make such changes to your content as are necessary to conform and adapt that content to the technical requirements of connecting networks, devices, services, or media.

Web Behavior Information is collected through log files, cookies, and web beacon technology during a visit to the 23andMe website. Web Behavior Information is used to improve our Services and the overall user experience, and if you have given consent to participate in 23andWe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andWe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andWe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.

Log Files. When users visit our website or use our mobile application, 23andMe gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e. a list of pages or URLs visited). We use this information, which is not designed to identify individual users, to analyze trends, administer the site, track users' movements around the site, and gather demographic information about our user base as a whole. We may, in some circumstances, need to review this automatically collected data in combination with specific Registration Information to identify and resolve issues for individual users.

Cookies. The 23andMe website also uses cookies. For information about cookies and how they are used on 23andMe's website, please read our [Cookie Policy](#).

Web Beacons. A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place cookies and web beacons on our website, in our emails, and in our advertisements that appear on other websites or in emails sent by

others that mention our products and services with our permission. The purpose of our web beacons is to support operation of our website and to offer additional products and services through targeted advertisements. For example, we may use beacons to determine when someone views a web page, count how many individuals visit our website after clicking advertisements placed on other websites, or count how many people have purchased products from our website after viewing an advertisement we placed. Web beacons may also help us determine the effectiveness of an email campaign because the beacons can count the number of individuals who open an email or forward it to others. We use this Web Behavior Information to better tailor our marketing to you and may also use this information to customize content on our website, enable a shopping cart, or conduct research. Third parties only collect anonymous Web Behavior Information through the use of web beacons, allowing statistical analysis relating to the performance of our advertising.

If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information Sharing

23andMe gives you the ability to connect with other individuals who have 23andMe accounts through our community forums, relative finding features, and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with 23andMe, any part of your Personal Information to friends and/or family members, groups of individuals, third-party service providers, doctors or other health care professionals, and/or other individuals. We recommend that you make such choices carefully.

Personal Information, once released or shared, can be difficult to contain. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with a third party. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of that person. It is incumbent upon customers to share Personal Information only with people they know and trust. Users with multi-profile accounts should use caution in setting profile-level privacy settings.

Ordering 23andMe Services as a Gift

If you provide us personal information about others, or if others give us your information for purposes of ordering the Personal Genome Service as a gift, we will only use that information for the specific reason for which it was provided to us, provided that once a gift recipient registers for his or her Services and agrees to our TOS, Privacy Statement and if applicable, Consent Form, his or her information will be used consistent with this Privacy Statement and those agreements.

Sharing Discoveries

If you provide us personal information about others within the mobile application for the purposes of sharing a 23andMe discovery we will use the email address you provide, or access your contacts list if you choose to allow us to do so, to send a one-time email with the discovery and an invitation inviting him or her to visit the site. 23andMe does not store this information.

If you provide us personal information about others on our website for the purposes of sharing a 23andMe discovery we will use the email address you provide and any additional information you provide to send a one-time email with the discovery and an invitation inviting him or her to visit the site. 23andMe stores this information for the sole purpose of sending this one-time email. Your friend may contact us at help@23andme.com to request that we remove this information from our database.

Information Disclosure

We do not sell, lease, or rent your individual-level Personal Information without your explicit consent. As a general rule, 23andMe will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- Partners or service providers (e.g. credit card processors or our contracted genotyping laboratory) process and/or store the information in order to provide you with 23andMe's Services.
- If you have consented for research, research contractors may access your individual-level Genetic and Self-Reported Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
- If you have consented to use of your individual-level data in the Research Portal feature, qualified researchers (who must comply with certain requirements) may access your individual-level Genetic and/or Self-Reported Information for the purpose of scientific research, which could lead to commercial use.
- We are required to do so by law or we do so in coordination with regulatory authorities (see the section below titled "Information Disclosure Required By Law").
- You have provided explicit consent for us to do so.

23andMe may disclose Personal Information for the following reasons:

- **23andMe Research.** 23andMe may disclose Aggregated Genetic and Self-Reported Information intended to be published in a peer-reviewed scientific journal to research collaborators or as a result of publication. You may give/withhold consent for your data to be used in 23andMe Research when viewing the applicable Consent Document during the process of claiming your Genetic Information into your account. You may also give consent or change your global consent status through your Account Settings at any subsequent time which will be effective thirty (30) days thereafter; however, we cannot withdraw information that has previously been used for published

research or shared with external collaborators prior to your request to withdraw consent. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after your withdrawal of consent.

- **Contact information.** 23andMe will ask for and require your explicit consent to allow partner organizations direct access to your Registration Information.
- **Commercial partnerships.** 23andMe may enter into commercial arrangements to enable partners to provide our Service to their customers and/or to provide you access to their products and services. We will not provide any individual-level Personal Information to these commercial partners without your explicit consent. 23andMe may include your Genetic and/or Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to these commercial partners even if you have not given consent for your data to be used in 23andMe Research.
- **Family Tree Health Mode.** If you opt to use 23andMe's collaborative Family Tree Health Mode feature, the FTHM terms of service apply.

Information Disclosure Required By Law

Under certain circumstances Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. You acknowledge and agree that 23andMe is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe TOS; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. In the event we are required by law to make a disclosure, we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order. As relates to 23andMe's IRB-approved research, 23andMe has obtained a Certificate of Confidentiality from the National Institutes of Health. If you are participating in 23andMe's IRB-approved research, 23andMe will withhold disclosure of your Personal Information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with the Certificate of Confidentiality. There are limits to what the Certificate of Confidentiality covers (for more information, please visit the [Certificates of Confidentiality Kiosk](#)).

Linked Websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your Personal Information to organizations operating linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

Customer Testimonials

We post testimonials from consenting customers on our web site, and may use testimonials in other formats consistent with consent received. Customer testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Account Closure and Correction of Personal Information

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Support at help@23andme.com. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in the applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research or the Research Portal will not be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update your Registration Information via your Account Settings page. You may also correct or reset Self-Reported Information entered into a survey, form, or feature by emailing a request to Customer Support at help@23andme.com and including the name of the specific survey, form, or feature.

Newsletter and Email Communications

You may choose to stop or start receiving our newsletter or marketing emails by changing your notifications settings in your account (go to Account, Settings, Notifications) or you can contact us at privacy@23andme.com.

Children's Privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed or intended to attract children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide Self-Reported Information on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

Security

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of reasonable physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Business Transitions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

Changes to This Privacy Statement

This Privacy Statement was last updated November 1, 2012. Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes.

Contact Information

If you have questions about this statement, please email 23andMe's Privacy Administrator at privacy@23andme.com. You can also contact us at this address if you have a question about 23andMe's handling of your information:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

[Read the previous version of the document.](#)

Exhibit 20

about 23andMe

Team 23andMe

News

Core Values

Policy Forum

Corporate Info

Jobs

who we are

Board of Directors

Leadership Team

Editorial Advisors

Scientific Advisory Board

privacy highlights page

Summary

- 23andMe respects your privacy. 23andMe does not sell, lease, or rent your individual-level Personal Information without explicit consent.
- We are committed to providing a secure, user-controlled environment for our Services.
- This summary provides highlights of our full [Privacy Statement](#) and applies to 23andMe's collection and handling of your Personal Information. We encourage you to read the full Statement.

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andMe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andMe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andMe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service" or "Services"** means 23andMe's products, software, services, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

Which Personal Information We Collect

"Personal Information" is information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information (see [Terms of Service](#) for a full list of related definitions):

- **"Registration Information"** is the information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
- **"Genetic Information"** is information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, and assignees; or otherwise processed by and/or contributed to 23andMe.
- **"Self-Reported Information"** is all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account. Self-Reported Information is included in 23andMe Research only if you have given consent as described in the applicable Consent Document.
- **"User Content"** is all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - *other than* Genetic Information and Self-Reported Information - generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
- **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Your Information

- 23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your authorization, conducting 23andMe Research.
- We use Registration Information to enable your purchase, inform you when your Genetic Information is available to you, provide you with customer service, manage our Services, and authenticate your website visits and usage.
- We may disclose to third parties, and/or use in our Services, **"Aggregated Genetic and Self-Reported Information"**, which is Genetic and Self-Reported Information that has been stripped of Registration Information and combined with data from a number of other users sufficient to minimize the possibility of exposing individual-level information while still providing scientific evidence. If you have given consent for your Genetic and Self-Reported Information to be used in 23andMe Research as described in the applicable Consent Document, we may include such information in Aggregated Genetic and Self-Reported Information intended to be published in peer-reviewed scientific journals. If you have given consent to participate in 23andMe Research, we may also allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines. If you do not give consent for your Genetic and Self-Reported Information to be used in 23andMe Research, we may still use your Genetic and/or Self-Reported Information for R&D purposes as described above, which may include disclosure of Aggregated

Genetic and Self-Reported Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.

- Except as otherwise set forth herein, we will never release your individual-level Genetic and/or Self-Reported Information to a third party without asking for and receiving your explicit consent to do so, unless required by law.
- We use Web Behavior Information to track and monitor aggregate usage of our website, for R&D, for quality control, to improve our Services, and/or to target advertising for our products and services, and if you have given consent to participate in 23andWe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andWe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andWe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.
- We give you the ability to share your Genetic Information with other 23andMe customers through sharing features.

Information Disclosure

- We will not disclose your individual-level Personal Information to any third party, except under the following circumstances:
 - Partners or service providers (e.g. our contracted genotyping laboratory or credit card processors) use and/or store the information in order to provide you with 23andMe's Services.
 - Research contractors may access your individual-level Personal Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
 - We are required to do so by law (see the section below titled "Information Disclosure Required By Law").
 - You have provided explicit consent for us to do so.

Your Choices

- Contribution of Personal Information other than Registration Information is voluntary and permission-based.
- Whether to give consent for 23andMe to use your Genetic and Self-Reported Information for 23andWe Research is voluntary.
- Providing Self-Reported Information through surveys, forms, or features is voluntary.
- At your written request we will close your account. As a result, all Genetic Information will be removed from the account and will no longer be accessible. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after account closure. We cannot remove Genetic Information that has previously been used for published research or shared with external collaborators before account closure. (See the section below titled "Account Closure and Correction of Personal Information".)

Additional Information

- We encourage you to read 23andMe's full [Privacy Statement](#).

How to Contact Us

Questions about this Summary, our Privacy Statement, or about 23andMe's handling of your Personal Information may be emailed to privacy@23andme.com, or sent to:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

full privacy statement

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andWe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andWe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andWe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service"** or **"Services"** means 23andMe's products, software, services, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

23andMe Respects Your Privacy

23andMe recognizes the importance of privacy and respects your desire to store and access your information in a private and secure manner.

This Privacy Statement for www.23andme.com is intended to make you aware of how we handle your Personal Information. We are committed to providing you a secure, user-controlled environment for the use of our Services. At the

same time, you share responsibility for maintaining privacy and security - for example, by keeping your password secure.

We encourage you to familiarize yourself with this Privacy Statement. Our [Consent Form](#) and [Terms of Service](#) explain that, by using our website and signing up for our service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

23andMe has been awarded TRUSTe's Privacy Seal signifying that this privacy statement and practices have been reviewed by TRUSTe for compliance with [TRUSTe's program requirements](#) including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program covers only information that is collected through this Web site, www.23andme.com. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy statement or practices, please contact us at privacy@23andme.com or Privacy Administrator, 23andMe, Inc. 1390 Shorebird Way, Mountain View, CA 94043. If you are not satisfied with our response you can contact [TRUSTe here](#).

Your Personal Information

In the course of your relationship with 23andMe, we collect several types of Personal Information. **"Personal Information"** is information that could be used to identify you, either alone or in combination with other information. We collect such information from you when you purchase our Services, create a personal account, complete surveys and forms, and/or when you communicate with us or request information from us. Personal Information collected online can be combined with Personal Information collected offline. We collect five primary types of Personal Information through our Service and website.

1. **"Registration Information"** is information that we collect from you when you purchase or sign up for our Services. Examples of such information include your name, credit card information, billing and shipping addresses, and contact information, such as email address and telephone number.
2. **"Genetic Information"** consists of your genotype, e.g. the As, Ts, Cs, and Gs at particular locations in your genome. Genetic Information is generated when you purchase 23andMe's Service and your saliva sample is analyzed and processed or you otherwise contribute or access your Genetic Information through our Services. Our instructions for sample collection and shipment clearly require you to send only your saliva sample to our third-party laboratory labeled with the unique barcode and no other identifier. The unique barcode identifies you to us but not to the laboratory. We are also required to provide sex and date of birth or age to the laboratory pursuant to Clinical Laboratory Improvement Amendments (CLIA) requirements. No other Personal Information is required for the analysis. To protect your privacy, receiving personnel at the laboratory will remove and discard any identifying information (e.g. name, address) included with saliva samples before testing personnel receive the samples for genotyping. Receiving personnel do not perform testing, and testing personnel only handle samples labeled with the unique barcode. Unless you choose to store your sample, DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but labeled only with a sample barcode. The laboratory conducting DNA extraction and analysis does not have access to your name, other Registration Information, or any other Personal Information except your sex and date of birth or age, as required by CLIA.
3. **"Self-Reported Information"** includes information you provide to us, including but not limited to information about your disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), personal traits (e.g., eye color, height), ethnicity, and/or family history (e.g. similar information about family members). We collect this information from you if and when you enter the information into surveys, forms, or features while signed in to your account. Self-Reported Information is included in 23andMe Research only you have given consent as described in the applicable Consent Document.
4. **"User Content"** is all information *other than* Genetic Information or Self-Reported Information generated by users of 23andMe Services and transmitted, whether publicly or privately, to 23andMe. User Content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, User Content includes posts made to the 23andMe community forums or emails to Customer Support. User Content *does not* include Genetic Information or Self-Reported Information.
5. **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Personal Information

23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your authorization, conducting 23andMe Research. Below we will describe the additional ways in which we use subsets of Personal Information.

How We Use Registration Information

We use your Registration Information to authenticate your website visits and usage; to enable your purchase; to communicate with you about information, services, and products that you have requested; and to manage and improve our website, software, and Services. We give you the opportunity to opt out of optional communications, either through our Service or by contacting our Privacy Administrator at privacy@23andme.com.

We use your Genetic and Self-Reported Information to provide you with 23andMe Services, customize the user experience, and enhance our features. **IF** you allow sharing, Genetic and Self-Reported Information may be displayed in other users' accounts. Self-Reported Information is used to customize your user experience - for example, by adjusting reports of genetic risk to account for your reported behaviors or environmental exposures.

If, and only if, you have given consent to participate in 23andMe Research as described in the applicable Consent Document, we may include your Genetic Information and Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to third parties for the purpose of publication in a peer-reviewed scientific journal. 23andMe Research is intended to advance genetic knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health care. Towards the same goals, if you have given consent to participate in 23andMe Research, we may allow research contractors to access your individual-level Genetic and/or Self-Reported Information onsite at 23andMe's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.

If you do not give your consent to participate in 23andMe Research, 23andMe may still use your Genetic and Self-Reported Information for purposes such as quality control or other R&D activities. Genetic and Self-Reported Information used for such purposes may be included in Aggregated Genetic and Self-Reported Information disclosed to third-party research partners who will not publish the information in a peer-reviewed scientific journal. Research partners may include commercial or non-profit organizations that conduct or support scientific/medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

How We Use User Content and Web Behavior Information

23andMe uses User Content to provide our Services and improve the overall user experience. For example, posts made to the 23andMe community forums are publicly displayed to other users. By submitting, posting, or displaying User Content, you give 23andMe a non-exclusive license to use any User Content that you submit, post, or display on or through the Services, as further described in Section 13 of the [Terms of Service](#). 23andMe may make such User Content available to other companies, organizations, or individuals with whom 23andMe has relationships, and to use such User Content in connection with the provision of those services. 23andMe, in performing the required technical steps to provide the Services to our users, may also (a) transmit or distribute your User Content over various public networks and in various media; and (b) make such changes to your content as are necessary to conform and adapt that content to the technical requirements of connecting networks, devices, services, or media.

Web Behavior Information is collected through log files, cookies, and web beacon technology during a visit to the 23andMe website. Web Behavior Information is used to improve our Services and the overall user experience, and if you have given consent to participate in 23andMe Research as described in the applicable Consent Document, your Web Behavior Information may be used and disclosed to third parties in aggregate form for 23andMe Research intended to be published in peer-reviewed scientific journals. If you do not give consent to participate in 23andMe Research, we may still use your Web Behavior Information for R&D purposes as described above, which may include disclosure of aggregated Web Behavior Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.

Log Files. When users visit our website, 23andMe gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e. a list of pages or URLs visited). We use this information, which is not designed to identify individual users, to analyze trends, administer the site, track users' movements around the site, and gather demographic information about our user base as a whole. We may, in some circumstances, need to review this automatically collected data in combination with specific Registration Information to identify and resolve issues for individual users.

Cookies. The 23andMe website also uses cookies. A cookie is a small text file that is stored on a user's computer when you visit our website or any other website through your computer. We use both session cookies and persistent cookies to make it easier for you to navigate our site, improve the security of your Personal Information, enhance the functionality of certain features, and improve performance. The cookies we employ are used to enable secure access to your account when you are signed in to your account and are only applicable within the confines of our website.

A session cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. However, if you set your browser to reject cookies, your ability to use our site will be significantly impaired. In particular, you will not be able to access any part of our site that requires a sign-in, such as your account.

Web Beacons. A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place cookies and web beacons on our website, in our emails, and in our advertisements that appear on other websites or in emails sent by others that mention our products and services with our permission. The purpose of our web beacons is to support operation of our website and to offer additional products and services through targeted advertisements. For example, we may use beacons to determine when someone views a web page, count how many individuals visit our website after clicking advertisements placed on other websites, or count how many people have purchased products from our website after viewing an advertisement we placed. Web beacons may also help us determine the effectiveness of an email campaign because the beacons can count the number of individuals who open an email or forward it to others. We use this Web Behavior Information to better tailor our marketing to you and may also use this information to customize content on our website, enable a shopping cart, or conduct research. Third parties only collect anonymous Web

Behavior Information through the use of web beacons, allowing statistical analysis relating to the performance of our advertising.

If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information Sharing

23andMe gives you the ability to connect with other individuals who have 23andMe accounts through our community forums, relative finding features, and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with 23andMe, any part of your Personal Information to friends and/or family members, groups of individuals, third-party service providers, doctors or other health care professionals, and/or other individuals. We recommend that you make such choices carefully.

Personal Information, once released or shared, can be difficult to contain. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with a third party. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of that person. It is incumbent upon customers to share Personal Information only with people they know and trust. Users with multi-profile accounts should use caution in setting profile-level privacy settings.

Ordering 23andMe Services as a Gift

If you provide us personal information about others, or if others give us your information for purposes of ordering the Personal Genome Service as a gift, we will only use that information for the specific reason for which it was provided to us, provided that once a gift recipient registers for his or her Services and agrees to our TOS, Privacy Statement and if applicable, Consent Form, his or her information will be used consistent with this Privacy Statement and those agreements.

Information Disclosure

We do not sell, lease, or rent your individual-level Personal Information without your explicit consent. As a general rule, 23andMe will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- Partners or service providers (e.g. credit card processors or our contracted genotyping laboratory) process and/or store the information in order to provide you with 23andMe's Services.
- If you have consented for research, research contractors may access your individual-level Genetic and Self-Reported Information onsite at 23andMe's offices for the purpose of scientific research, provided that all such research contractors will be supervised by 23andMe and subject to 23andMe's access rules and guidelines.
- We are required to do so by law (see the section below titled "Information Disclosure Required By Law").
- You have provided explicit consent for us to do so.

23andMe may disclose Personal Information for the following reasons:

- **23andMe Research.** 23andMe may disclose Aggregated Genetic and Self-Reported Information intended to be published in a peer-reviewed scientific journal to research collaborators or as a result of publication. You may give/withhold consent for your data to be used in 23andMe Research when viewing the applicable Consent Document during the process of claiming your Genetic Information into your account. You may also give consent or change your global consent status through your Account Settings at any subsequent time which will be effective thirty (30) days thereafter; however, we cannot withdraw information that has previously been used for published research or shared with external collaborators prior to your request to withdraw consent. 23andMe will not use your Genetic Information in new research that starts thirty (30) days or more after your withdrawal of consent.
- **Contact information.** 23andMe will ask for and require your explicit consent to allow partner organizations direct access to your Registration Information.
- **Commercial partnerships.** 23andMe may enter into commercial arrangements to enable partners to provide our Service to their customers and/or to provide you access to their products and services. We will not provide any individual-level Personal Information to these commercial partners without your explicit consent. 23andMe may include your Genetic and/or Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to these commercial partners even if you have not given consent for your data to be used in 23andMe Research.
- **Family Health History.** If you opt to use 23andMe's collaborative Family Health History feature, the FHH terms of service apply.

Information Disclosure Required By Law

Under certain circumstances Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. You acknowledge and agree that 23andMe is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe TOS; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. In such event we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order. As relates to 23andMe's IRB-approved research, 23andMe has obtained

a Certificate of Confidentiality from the National Institutes of Health. If you are participating in 23andMe's IRB-approved research, 23andMe will withhold disclosure of your Personal Information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with the Certificate of Confidentiality. There are limits to what the Certificate of Confidentiality covers (for more information, please visit the [Certificates of Confidentiality Kiosk](#)).

Linked Websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your Personal Information to organizations operating linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

Customer Testimonials

We post customer testimonials on our web site, and may use testimonials in other formats consistent with consent received. Customer testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Account Closure and Correction of Personal Information

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Support at help@23andme.com. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in the applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andMe Research will not be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update your Registration Information via your Account Settings page. You may also correct or reset Self-Reported Information entered into a survey, form, or feature by emailing a request to Customer Support at help@23andme.com and including the name of the specific survey, form, or feature.

Newsletter and Email Communications

You may choose to stop or start receiving our newsletter or marketing emails by changing your notifications settings in your account (go to Account, Settings, Notifications) or you can contact us at privacy@23andme.com.

Children's Privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed or intended to attract children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide Self-Reported Information on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

Security

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of reasonable physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. In particular, all connections to and from our website are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Business Transitions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

Changes to This Privacy Statement

This Privacy Statement was last updated December 1, 2011. Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes.

Contact Information

If you have questions about this statement, please email 23andMe's Privacy Administrator at privacy@23andme.com.
You can also contact us at this address if you have a question about 23andMe's handling of your information:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

[Read the previous version of the document.](#)

Exhibit 21



[genetics just got personal.](#)

Search 23andMe

[Log in](#)

about 23andMe

Team 23andMe

News

Core Values

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Jobs

who we are

Board of Directors

Leadership Team

Editorial Advisors

Scientific Advisory Board

privacy statement

Summary

- 23andMe respects your privacy. 23andMe does not sell, lease, or rent your individual-level Personal Information without explicit consent.
- We are committed to providing a secure, user-controlled environment for our Services.
- This summary provides highlights of our full [Privacy Statement](#) and applies to 23andMe's collection and handling of your Personal Information. We encourage you to read the full Statement.

Definitions

- **"23andMe"** means 23andMe, Inc., whose principal place of business is at 1390 Shorebird Way, Mountain View, CA 94043.
- **"23andWe Research"** means scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal. 23andWe Research only uses Genetic and Self-Reported Information from users who have given consent according to the applicable Consent Document. 23andWe Research activities do not include R&D.
- **"R&D"** means research and development activities performed by 23andMe on user data. These activities may include, among other things, improving our Services and/or offering new products or services to you; performing quality control activities; conducting data analysis that may lead to and/or include commercialization with a third party.
- **"Service"** or **"Services"** means 23andMe's products, software, services, and website as accessed from time to time by the user, regardless if the use is in connection with an account or not.

Which Personal Information We Collect

"Personal Information" is information that can be used to identify you, either alone or in combination with other information. 23andMe collects and stores the following types of Personal Information (see [Terms of Service](#) for a full list of related definitions):

- **"Registration Information"** is the information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
- **"Genetic Information"** is information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your saliva by 23andMe or by its contractors, successors, and assignees; or otherwise processed by and/or contributed to 23andMe.
- **"Self-Reported Information"** is all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your 23andMe account. Self-Reported Information is included in 23andWe Research only if it has been indicated for 23andWe Research use on the website and if you have given consent as described in the applicable Consent Document.
- **"User Content"** is all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - *other than* Genetic Information and Self-Reported Information - generated by users of 23andMe Services and transmitted, whether publicly or privately, to or through 23andMe.
- **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Your Information

- 23andMe collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our Services. These include, among other things, providing you with our Services; improving our Services and/or offering new products or services to you; performing quality control activities; conducting other R&D; and, upon your authorization, conducting 23andWe Research on diseases, traits, and other conditions.
- We use Registration Information to enable your purchase, inform you when your Genetic Information is available to you, provide you with customer service, manage our Services, and authenticate your website visits and usage. We may also use this information to offer you other products or services or to invite you to participate in specific research projects.

- We may disclose to third parties and/or use in our Services, "Aggregated Genetic and Self-Reported Information", which is Genetic and Self-Reported Information that has been stripped of Registration Information and combined with data from a number of other users sufficient to minimize the possibility of exposing individual-level information while still providing scientific evidence. If you have given consent for your Genetic and Self-Reported Information to be used in 23andWe Research as described in the applicable Consent Document, we may include such information in Aggregated Genetic and Self-Reported Information intended to be published in peer-reviewed scientific journals. If you do not give consent for your Genetic and Self-Reported Information to be used in 23andWe Research, we may still use your Genetic and/or Self-Reported Information for R&D purposes as described above, which may include disclosure of Aggregated Genetic and Self-Reported Information to third-party non-profit and/or commercial research partners who will not publish that information in a peer-reviewed scientific journal.
- We will never release your individual-level Genetic and/or Self-Reported Information to a third party without asking for and receiving your explicit consent to do so, unless required by law.
- We use Web Behavior Information to track and monitor aggregate usage of our website, for R&D, for quality control, to improve our Services, and/or to target advertising for our products and services.
- We give you the ability to share your Genetic Information with other 23andMe customers through sharing features.
- We will not disclose your individual-level Personal Information to any third party, except under the following circumstances:
 - Partners or service providers (e.g. our contracted genotyping laboratory or credit card processors) use and/or store the information in order to provide you with 23andMe's Services.
 - We are required to do so by law (see the section below titled "Information Disclosure Required By Law").
 - You have provided explicit consent for us to do so.

Your Choices

- Contribution of Personal Information other than Registration Information is voluntary and permission-based.
- Whether to give consent for 23andMe to use your Genetic and Self-Reported Information for 23andWe Research is voluntary.
- Providing Self-Reported Information through surveys, forms, or features indicated for 23andWe Research use is voluntary.
- At your written request we will close your account. As a result, all Genetic Information will be removed from the account and will no longer be accessible. 23andMe will not use your Genetic Information in research taking place starting thirty (30) days after account closure. We cannot remove Genetic Information that has previously been used for published research or shared with external collaborators before account closure. (See the section below titled "Account Closure and Correction of Personal Information".)

Additional Information

- We encourage you to read 23andMe's full [Privacy Statement](#).

How to Contact Us

Questions about this Summary, our Privacy Statement, or about 23andMe's handling of your Personal Information may be emailed to privacy@23andme.com, or sent to:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

Full Privacy Statement

23andMe Respects Your Privacy

23andMe recognizes the importance of privacy and respects your desire to store and access your information in a private and secure manner.

This Privacy Statement is intended to make you aware of how we handle your Personal Information. We are committed to providing you a secure, user-controlled environment for the use of our Services. At the same time, you share responsibility for maintaining privacy and security - for example, by keeping your password secure.

We encourage you to familiarize yourself with our Privacy Statement. Our [Consent Form](#) and [Terms of Service](#) explain that, by using our website and signing up for our service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

Your Personal Information

In the course of your relationship with 23andMe, we collect several types of Personal Information. Personal Information is information that could be used to identify you, either alone or in combination with other information. We collect such information from you when you purchase our Services, create a personal account, complete surveys and forms, and/or when you communicate with us or request information from us. Personal Information collected online can be combined with Personal Information collected offline. We collect five primary types of Personal Information through our Service and website.

1. **"Registration Information"** is information that we collect from you when you purchase or sign up for our Services. Examples of such information include your name, credit card information, billing and shipping addresses, and contact information, such as email address and telephone number.
2. **"Genetic Information"** consists of your genotype, e.g. the As, Ts, Cs, and Gs at particular locations in your genome. Genetic Information is generated when you purchase 23andMe's Service and your saliva sample is analyzed and processed or you otherwise contribute or access your Genetic Information through our Services. Our instructions for sample collection and shipment clearly require you to send only your saliva sample to our third-party laboratory labeled with the unique barcode and no other identifier. The unique barcode identifies you to us but not to the laboratory. We are also required to provide sex and date of birth or age to the laboratory pursuant to CLIA requirements. No other Personal Information is required for the analysis. To protect your privacy, receiving personnel at the laboratory will remove and discard any identifying information (e.g. name, address) included with saliva samples before testing personnel receive the samples for genotyping. Receiving personnel do not perform testing, and testing personnel only handle samples labeled with the unique barcode. Unless you choose to store your sample, DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but labeled only with a sample barcode. The laboratory conducting DNA extraction and analysis does not have access to your name, other Registration Information, or any other Personal Information except your sex and date of birth or age, as required by CLIA.
3. **"Self Reported Information"** includes information you provide to us, including but not limited to information about your disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), personal traits (e.g., eye color, height), ethnicity, and/or family history (e.g. similar information about family members). We collect this information from you if and when you enter the information into surveys, forms, or features while signed in to your account. Self-Reported Information is included in 23andWe Research only if it has been indicated for 23andWe Research use on the website and if you have given consent as described in the applicable Consent Document.
4. **"User Content"** is all information *other than* Genetic Information or Self-Reported Information generated by users of 23andMe Services and transmitted, whether publicly or privately, to 23andMe. User Content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, User Content includes posts made to the 23andMe community forums or emails to Customer Support. User Content *does not* include Genetic Information or Self-Reported Information.
5. **"Web Behavior Information"** is information on how you use the 23andMe website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.

How We Use Registration Information

We use your Registration Information to authenticate your website visits and usage; to enable your purchase; to communicate with you about information, services, and products that you have requested; and to manage and improve our website, software, and Services. We may also use this information to offer you services and products that may be of interest to you or invite you to participate in specific research projects. We give you the opportunity to opt out of optional communications, either through our Service or by contacting our Privacy Administrator at privacy@23andme.com.

How We Use Genetic and Self-Reported Information

We use your Genetic and Self-Reported Information to provide you with 23andMe Services, customize the user experience, and enhance our features. **IF** you allow sharing, Genetic and Self-Reported Information may be displayed in other users' accounts. Self-Reported Information is used to customize your user experience - for example, by adjusting reports of genetic risk to account for your reported behaviors or environmental exposures.

If, and only if, you have given consent to participate in 23andWe Research as described in the applicable Consent Document, we may include your Genetic Information and Self-Reported Information indicated for 23andWe Research use in Aggregated Genetic and Self-Reported Information disclosed to third parties for the purpose of publication in a peer-reviewed scientific journal. 23andWe Research is intended to advance genetic knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health care.

If you do not give your consent to participate in 23andWe Research, 23andMe may still use your Genetic and Self-Reported Information for purposes such as quality control or other R&D activities. Genetic and Self-Reported Information used for such purposes may be included in Aggregated Genetic and Self-Reported Information disclosed to third-party research partners who will not publish the information in a peer-reviewed scientific journal.

Research partners may include commercial or for-profit organizations that conduct or support scientific/medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

How We Use User Content and Web Behavior Information

23andMe uses User Content to provide our Services and improve the overall user experience. For example, posts made to the 23andMe community forums are publicly displayed to other users. See Section 13 of the Terms of Service for a full description of your rights relating to User Content.

Web Behavior Information is collected through log files, cookies, and web beacon technology during a visit to the 23andMe website. Web Behavior Information is used to improve our Services and the overall user experience.

Log Files. When users visit our website, 23andMe gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e. a list of pages or URLs visited). We use this information, which is not designed to identify individual users, to analyze trends, administer the site, track users' movements around the site, and gather demographic information about our user base as a whole. We may, in some circumstances, need to review this automatically collected data in combination with specific Registration Information to identify and resolve issues for individual users.

Cookies. The 23andMe website also uses cookies. A cookie is a small text file that is stored on a user's computer when you visit our website or any other website through your computer. We use both session cookies and persistent cookies to make it easier for you to navigate our site, improve the security of your Personal Information, enhance the functionality of certain features, and improve performance. The cookies we employ are used to enable secure access to your account when you are signed in to your account and are only applicable within the confines of our website.

A session cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. However, if you set your browser to reject cookies, your ability to use our site will be significantly impaired. In particular, you will not be able to access any part of our site that requires a sign-in, such as your account.

Web Beacons. A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place cookies and web beacons on our website, in our emails, and in our advertisements that appear on other websites or in emails sent by others that mention our products and services with our permission. The purpose of our web beacons is to support operation of our website and to offer additional products and services through targeted advertisements. For example, we may use beacons to determine when someone views a web page, count how many individuals visit our website after clicking advertisements placed on other websites, or count how many people have purchased products from our website after viewing an advertisement we placed. Web beacons may also help us determine the effectiveness of an email campaign because the beacons can count the number of individuals who open an email or forward it to others. We use this Web Behavior Information to better tailor our marketing to you and may also use this information to customize content on our website, enable a shopping cart, or conduct research. Third parties only collect anonymous Web Behavior Information through the use of web beacons, allowing statistical analysis relating to the performance of our advertising.

If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information Sharing

23andMe gives you the ability to connect with other individuals who have 23andMe accounts through our community forums, relative finding features, and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with 23andMe, any part of your Personal Information to friends and/or family members, groups of individuals, third-party service providers, doctors or other health care professionals, and/or other individuals. We recommend that you make such choices carefully.

Personal Information, once released or shared, can be difficult to contain. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with a third party. Likewise, if you are reading this because you have access to the Personal Information of a 23andMe customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of that person. It is incumbent upon customers to share Personal Information only with people they know and trust. Users with multi-profile accounts should use caution in setting profile-level privacy settings.

Information Disclosure

As a general rule, 23andMe will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- Partners or service providers (e.g. credit card processors or our contracted genotyping laboratory) process and/or store the information in order to provide you with 23andMe's Services.

- We are required to do so by laws of the section below titled "Information Disclosure Required By Law").
- You have provided explicit consent for us to do so.

23andMe may disclose Personal Information for the following reasons:

- **23andWe Research.** 23andMe may disclose Aggregated Genetic and Self-Reported Information intended to be published in a peer-reviewed scientific journal to research collaborators or as a result of publication. You may give/withhold consent for your data to be used in 23andWe Research when viewing the applicable Consent Document during the process of claiming your Genetic Information into your account. You may also give consent or change your global consent status through your Account Settings at any subsequent time; however, we cannot withdraw information that has previously been used for published research or shared with external collaborators prior to your request to withdraw consent.
- **Contact information.** 23andMe will ask for and require your explicit consent to allow partner organizations direct access to your Registration Information.
- **Commercial partnerships.** 23andMe may enter into commercial arrangements to enable partners to provide our Service to their customers and/or to provide you access to their products and services. We will not provide any individual-level Personal Information to these commercial partners without your explicit consent. 23andMe may include your Genetic and/or Self-Reported Information in Aggregated Genetic and Self-Reported Information disclosed to these commercial partners even if you have not given consent for your data to be used in 23andWe Research.

Information Disclosure Required By Law

Under certain circumstances Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. You acknowledge and agree that 23andMe is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal process (such as a judicial proceeding, court order, or government inquiry) or obligations that 23andMe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the 23andMe TOS; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of 23andMe, its employees, its users, its clients, and the public. In such event we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order.

Linked Websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. 23andMe does not disclose your Personal Information to organizations operating linked third-party websites. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by 23andMe.

Account Closure and Correction of Personal Information

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Support at help@23andme.com. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in the applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in 23andWe Research will not be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update your Registration Information via your Account Settings page. You may also correct or reset Self-Reported Information entered into a survey, form, or feature indicated for 23andWe Research use by emailing a request to Customer Support at help@23andme.com and including the name of the specific survey, form, or feature.

Children's Privacy

23andMe is committed to protecting the privacy of children as well as adults. Neither 23andMe nor any of its Services are designed or intended to attract children under the age of 13. A parent or guardian, however, may collect a saliva sample from, create an account for, and provide Self-Reported Information on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

Security

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of reasonable physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. In particular, all connections to and from our website are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure Personal Information that you release on your own or that you request us to release.

Business Transitions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

Changes to This Privacy Statement

This Privacy Statement was last updated June 24, 2010. Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes.

Contact Information

If you have questions about this statement, please email 23andMe's Privacy Administrator at privacy@23andme.com. You can also contact us at this address if you have a question about 23andMe's handling of your information:

Privacy Administrator
23andMe, Inc.
1390 Shorebird Way
Mountain View, CA 94043

Last updated June 24, 2010. Click [here](#) to see a summary of changes.

[Read the previous version of the document.](#)

Exhibit 22



23andMe genetics just got personal.

Search 23andMe

about 23andMe

Team 23andMe

News

Core Values

Policy Forum

Corporate Info

Jobs

who we are

Board of Directors

Editorial Team

Advisors

Summary

- 23andMe respects your privacy.
- This notice provides highlights of our full [Privacy Statement](#) and applies to 23andMe's collection and handling of your personal information.
- We are committed to providing a secure, user controlled environment to access, share, and explore your genetic information.

Personal Information

- When you sign up for our service, 23andMe collects and stores personal information about you, including Account Information (contact and payment information) and Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome).
- On a voluntary basis, we may collect Phenotypic Information (disease conditions and personal traits) if you choose to participate in 23andMe-authorized research by answering an online survey and/or questionnaire.
- We also collect non-personal information (browser types, domains, page views) on how you use our web site through log files and cookies.

Uses of Information

- 23andMe collects personal information from you to provide you with our service and for conducting 23andMe-authorized research.
- We use Account Information to enable your purchase, inform you when your Genetic Information is available to you, and authenticate your website visits and usage.
- We may use Genetic and Phenotypic Information to conduct 23andMe-authorized scientific research and development. Any Phenotypic Information you provide is done on a voluntary basis. We may provide third party organizations access to this information for scientific research, but without your name or any other Account Information.
- We give you the ability to connect with other 23andMe customers through sharing features, but it is entirely your choice to do so.
- We will not release your personal information to any outside company without your explicit consent.
- We use non-personal information to track and monitor aggregate usage of our website and for internal analysis, quality control, and improvements to our services.

Your Choices

- Participation in activities and services that involve personal information beyond initial account and Genetic Information is voluntary and permission-based.
- It is entirely within your discretion to provide information or answer survey questions.
- At your request we will delete your account and personal information linked to your account from our systems.

Additional Information

- We encourage you to read 23andMe's full [Privacy Statement](#).
- For additional information about our views on privacy, please see our [Core Values](#) and [Policy Forum](#).

How to Contact Us

Questions about this statement, our full Privacy Statement, or about 23andMe's handling of your personal information may be emailed to privacy@23andme.com, or

Privacy Administrator
23andMe, Inc.
2606 Bayshore Parkway
Mountain View, CA 94043

Full Privacy Statement

23andMe Respects Your Privacy

23andMe recognizes the importance of privacy and respects your choices to store and access your information in a private and secure manner.

This Privacy Statement is intended to answer questions that you may have related to how we handle your personal information. We want to explain what information we collect from you and what we do with it. We have many controls, systems, and procedures that govern how we use, handle, and store this information in a secure and private manner and we want you to know about them. We also want to clarify how this information may be shared with other parties and what controls you have regarding the handling of your information.

Our services connect you with your genetic information. 23andMe collects and stores your genetic information for you in our databases and offers you access to a web-based interface with unique tools to help you interpret and review the information. We are committed to providing you a secure, user-controlled environment to access, share, and explore your genetic information. At the same time, you share some responsibility for maintaining privacy and security, like keeping your password secure.

We encourage you to familiarize yourself with our Privacy Statement. Our [Consent Form](#) and [Terms of Service](#) explain that, by using our website and signing up for our service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

Personal Information

23andMe collects several types of personal and non-personal information either directly from you and/or through our service providers and partners. These can be described as follows:

Personal Information

Personal information is information that can be used to uniquely identify you or that you may consider sensitive. We collect such information from you when you purchase our services, create a personal account, complete surveys and questionnaires, and/or when you communicate with us or request information from us directly. We collect three primary types of personal information through our service and website.

- **Account Information** - Account Information is personal information that we collect from you when you purchase our service. Examples of such information include your name, credit card information, billing and shipping addresses, and contact information such as an email address or telephone number. We also use log files and cookies to maintain our website and monitor the quality of the service we provide to you. Cookies used by the website are linked to a customer's Account Information. (See Log Files and Cookies below for more information.)
- **Genetic Information** - Genetic Information consists of your genotype, that is, the As, Ts, Cs, and Gs at particular locations in your genome. When you purchase 23andMe's service, you send your saliva sample to us by postal mail for analysis, along with a barcode that identifies you to us but not to the processing laboratory. Our contracted laboratories extract and analyze DNA from saliva samples and securely communicate the resulting Genetic Information to us along with the barcode for each individual analyzed. DNA and saliva samples are destroyed after the laboratory completes its work, which includes processing, analysis and reporting of data. Genetic Information is then stored securely in our databases and can be accessed by you via our website by using the claim code and creating your personal account. It is important to note that the laboratories conducting DNA extraction and analysis do not have access to your name or any of your Account Information, as described above. Our instructions for sample collection and shipment clearly indicate that you must send only your saliva sample, which is labeled with a unique barcode, with no other identifier. To protect your privacy, samples sent with any identifier other than the barcode will not be processed.
- **Phenotypic Information** - Phenotypic Information is personal information that includes disease conditions (e.g., Type 2 Diabetes), other health information (e.g., pulse rate, cholesterol levels, visual acuity) personal traits (e.g., eye color, height), ethnicity, and family history (e.g., similar information about family members). We obtain this information from you on a voluntary basis when you choose to participate in 23andMe-authorized research by answering our surveys and/or questionnaires.

Non-Personal Information

Non-Personal Information includes information that we gather as you navigate our website. We log this information when you visit and browse our website. We record details such as browser types, domains, statistics of your visit including page views, and time spent on the website. We use this information to improve our services for you and other customers. Although it is non-personal, this information is linked to your Account Information if you are logged into our website.

Uses of Information

We use personal information to provide you with the service that you have purchased and for 23andMe-authorized research. Our service gives you access to your Genetic Information, as well as the opportunity to share and compare your Genetic and Phenotypic Information with that of other people who have also agreed to share such information.

We use personal information that we collect about you to:

- Authenticate your website visits and usage (e.g., user names and passwords)
- Enable your purchase (e.g., credit card number, billing address)
- Provide you the information, services, and products that you have requested (e.g., contact, Genetic Information)
- Inform you when your Genetic Information is available to you (e.g., e-mail address)
- Inform you of services and products that may be of interest to you (e.g., contact)

- Manage and improve our website, services and products (e.g., website usage information)
- Conduct 23andMe-authorized scientific research and development (e.g., Genetic and Phenotypic Information)

We use Non-Personal Information to track and monitor aggregate usage of our website and for internal analysis, quality control, and improvements to our service. We collect such information by using cookies and other standard web technologies. (See Log Files and Cookies below for more information.)

Information Sharing and Disclosure

23andMe gives you the ability to connect with other individuals who have 23andMe accounts through our sharing features. Whether you use these features is entirely your choice. In addition, you may choose to disclose, through other means not associated with 23andMe, your personal information to friends and/or family members, groups of individuals, third-party service providers, doctors or other professionals, and/or other individuals. We recommend that you make such choices carefully.

Personal information, once released or shared, can be difficult to contain. 23andMe will have no responsibility or liability for any consequences that may result because you have released or shared personal information with a third party. Likewise, if you are reading this because you have access to the personal information of a 23andMe customer, we urge you to recognize your responsibility to protect the privacy of that person.

23andMe will not release your personal information to any outside company without your explicit consent. Please see the [consent form](#) to be completed prior to purchase.

23andMe may disclose personal information for other purposes as stated below:

Disclosure to Research Partners:

One of 23andMe's goals is to contribute to scientific research and the advancement of genetic knowledge. To achieve our research goals, 23andMe may enter into partnerships with commercial and/or non-profit organizations that conduct scientific and/or medical research. Such partnerships may allow an organization access to our databases of Genetic Information and other contributed Phenotypic Information, so that, for example, the organization can search, without knowing the identities of the individuals involved, for the correlation between presence of a particular genetic variation and a particular health condition or trait. We may receive compensation from these research partners. Before we embark on any research collaborations we will establish a research advisory committee to guide such collaborations and undertakings. In addition, we will require partner organizations by contract to agree to maintain confidentiality consistent with this Privacy Statement. Partner organizations will not have access to your Account Information (e.g., name, contact information, payment information).

On occasion, we may pass along a request to you from such a partner, asking for you to participate in a specific study or to volunteer further information. The partner does not know to whom we send these queries and you have no obligation to respond.

Disclosure to Commercial Partners

23andMe may enter into commercial arrangements to enable partners to provide our service to their customers and/or to provide you access to their products and services. We may collect fees for these referrals. We will require informed consent from you as a precondition to providing any personal information to these commercial partners.

Disclosure Required By Law

Please be aware that under certain circumstances personal information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. In the event that we are legally compelled to disclose your personal information to a third party, we will notify you with the contact information you have provided to us in advance unless doing so would violate the law or a court order.

Non-Disclosure to Linked Websites

23andMe provides links to third-party websites operated by organizations not affiliated with 23andMe. These links may be found within our content or placed beside the names or logos of these third parties. 23andMe does not disclose your personal information to organizations operating third-party websites. We may receive compensation from organizations operating third-party websites, which will be noted on the page the link appears. 23andMe does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that collects personal information. This Privacy Statement applies solely to information collected by 23andMe.

Your Choices and Privacy Preferences

At 23andMe, customer choice and control are critical to our goal of providing genetic information within a trusted environment. Participation in activities and services that involve personal information beyond the initial Account and Genetic Information is voluntary and permission-based. Examples of such activities include sharing your account information with other 23andMe customers, responding to surveys, joining a 23andMe-authorized research project, and subscribing to a newsletter.

If your personal information changes, or if you no longer wish to subscribe to our services, then you may correct, update, or delete your account by making the change via your account page, by sending a request to our Customer Support at help@23andme.com.

When deleting an account, we remove from our systems all Genetic and Phenotypic Information that can be associated with your Account Information. As stated in our Consent Form, however, Genetic Information and/or Phenotypic Information you have provided for research prior to your request for deletion will not be removed from ongoing or completed studies that are using the information. Neither Account Information nor a link to your account are used in 23andMe-authorized research. In addition, we retain limited Account Information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

Children's Privacy

23andMe is committed to protecting the privacy of children, as well as adults. Neither 23andMe nor any of its services are designed or intended to attract children under the age of 13. A parent or guardian, however, may order and set up an account for our services on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to 23andMe about his or her child is kept secure and that the information submitted is accurate.

Log Files and Cookies

Log Files

As do operators of most websites, 23andMe gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e., a list of pages or URLs visited). We use this information, which is not designed to identify individual users, to analyze trends, administer the site, track users' movements around the site, and gather demographic information about our user base as a whole. We may, in some circumstances, need to review this automatically collected data in combination with specific Account Information to identify and resolve issues for individual users.

Cookies

The 23andMe website also uses cookies. A cookie is a small text file that is stored on a user's computer when you visit our website or any other website through your computer. We use both session cookies and persistent cookies to make it easier for you to navigate our site, improve the security of your personal information, enhance the functionality of certain features, and improve performance. The cookies we employ are used to enable secure access to your account when you are logged in and are only applicable within the confines of our website.

A session cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's [help](#) file. However, if you set your browser to reject cookies, your ability to use our site will be significantly impaired. In particular, you will not be able to access any part of our site that requires a log in, such as your personal genome account.

Security

23andMe takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, 23andMe uses a range of physical, technical and administrative procedures to safeguard the information we collect.

While there is always some risk of a security compromise, we tightly control access to personal information through the following technical, physical, and administrative security measures. By contract, we require third parties with whom we share personal information to implement appropriate security measures to maintain the confidentiality of such information.

Technical:

- We protect our network perimeters with firewalls.
- Our databases are designed to keep Genetic Information and Phenotypic Information separate from Account Information.
- We encrypt storage of certain personal information, including Account Information and Genetic Information.
- We encrypt all connections to and from our website.
- We conduct internal and external audits of perimeter and software code security.
- We monitor our employees' use of our databases and maintain records of all access to personal information.

Physical:

- Physical access to internal servers is restricted to authorized personnel.
- We restrict data center access to approved personnel via photo and passcode authentication, biometrics, and other security protocols.

Administrative:

- We prohibit personal information from being extracted from our systems and loaded onto laptops or other mobile devices, or from being sent out electronically.

- We limit access to personal information to our employees for limited, approved purposes based on their specific responsibilities.
- We require annual privacy and security training for employees with access to personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our services. You should not disclose your authentication information to any third party and should immediately notify 23andMe of any unauthorized use of your password. 23andMe cannot secure personal information that you release on your own or that you request us to release.

Despite 23andMe's efforts to protect your personal information, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the Internet will be intercepted.

Business Transitions

In the event that 23andMe goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information and non-personal information will likely be among the assets transferred. You will be notified in advance via email and prominent notice on our website of any such change in ownership or control of your personal information. We will require an acquiring company or merger agreement to uphold the material terms of this privacy statement, including honoring requests for account deletion.

Changes to this Privacy Statement

This Privacy Statement was last updated November 11, 2007. A notice will be posted as part of this Privacy Statement and on our customer accounts' login pages for 30 days whenever this Privacy Statement is changed in a material way, highlighting both the old and new content in a way that makes the changes easy to understand. In addition, all customers will receive an email with notification of the changes.

Contact Information

If you have questions about this statement, please send an e-mail to 23andMe's privacy administrator at privacy@23andme.com. You can also contact us at this address if you have a question about 23andMe's handling of your information:

Privacy Administrator
23andMe, Inc.
2606 Bayshore Parkway
Mountain View, CA 94043

Exhibit 23



Shop

Privacy Notice for U.S. State Residents

Last Updated: March 15, 2024

Summary

This policy, together with the 23andMe Privacy Statement, includes the information and disclosures we are required to provide to you under U.S. State Data Protection Laws. You should read them both carefully.

This Privacy Notice for U.S. State Residents applies to residents of California, Washington, Colorado, Virginia, Utah, and Connecticut and contains information required by the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act, the Colorado Privacy Act ("CPA"), the Virginia Consumer Data Protection Act ("VCDPA"), the Utah Consumer Privacy Act ("UCPA"), the Washington My Health My Data Act ("MHMDA"), and the Connecticut Data Privacy Act ("CTDPA") (collectively, "U.S. State Data Protection Laws"), as amended or replaced from time to time, along with any implementing regulations, and supplements our [Privacy Statement](#).

This policy, together with the 23andMe Privacy Statement, includes the information and disclosures we are required to provide to you under U.S. State Data Protection Laws. You should read them both carefully.

23andMe applies certain privacy controls to all U.S. customers. For example, all customers can request a copy of their data, request deletion, and control their privacy settings in their Account Settings. This notice makes sure we cover state-specific requirements. In the event of any conflict between the terms of this notice and the Privacy Statement, the terms of this notice prevail.

Here is a summary before we dive into the details:

- You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.

- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

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1. Your Rights

When we talk about “Personal Information” in this notice, we mean any information that identifies, relates to, describes, is capable of being associated with you, or could reasonably be linked, directly or indirectly, with you, and as otherwise defined in the U.S. State Data Protection Laws. The U.S. State Data Protection Laws do not consider publicly available information, deidentified, or aggregate consumer information as “Personal Information.”

We will not attempt to reidentify deidentified information (except as necessary to test our deidentification processes to ensure no individuals can be identified) and will use it only in deidentified form.

Let’s start with your privacy rights first. You have the right to:

- Know what Personal Information we collect, use, disclose, share, or sell.
- Receive a copy of your Personal Information.
- Correct inaccurate Personal Information.
- Delete your Personal Information.
- Receive your Personal Information in a portable and, if technically feasible, in a readily usable format.
- Opt out of: targeted advertising; the sale or sharing of your Personal Information with third parties; and/or, profiling in the furtherance of decisions that produce legal or similarly significant effects. Please see our [Cookie Choices](#) page for more information.
- Limit the use and sharing of your sensitive Personal Information. Sensitive Personal Information includes, but is not limited to, Personal Information that reveals your racial or ethnic origin, religious beliefs, mental or health conditions or diagnosis, sex life or sexual orientation, citizenship or immigration status, genetic data, precise geolocation, or as otherwise defined in applicable U.S. State Data Protection Laws. Your 23andMe Registration Information, Genetic Information, and Self-Reported information likely include sensitive Personal Information.
- Not receive discriminatory treatment if you exercise your privacy rights.

We make it easy to exercise your rights to [know](#), [correct](#), and [delete](#) your Personal Information by making them available through your Account Settings. To access Account Settings, you must [log in](#) to your 23andMe account.

If you do not have a 23andMe account and would like to make a privacy rights request, or to appeal an action we made related to your privacy request, you can email us

Case 25-40976 Doc 777 Filed 06/17/25 Entered 06/17/25 01:38:00 Main Document
at privacy@23andme.com with the subject line "Privacy Rights Request". We will require
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some additional information to verify your identity in order to process your request.
Alternatively, you may exercise your privacy rights through an authorized agent. If you use an
authorized agent, we will require you to verify your identity and confirm that you have
provided the authorized agent permission to submit the request on your behalf.

We will respond to your request within 45 days, and in more difficult cases we may extend
our response time by another 45 days. The easiest way to exercise your rights is through
your Account Settings so we can quickly verify your identity. Your rights under the U.S. State
Data Protection Laws are not absolute and 23andMe may exercise limitations or exemptions
as permitted by the U.S. State Data Protection Laws.

Notice of Right to Opt-Out of Sale/Sharing

Like many websites, 23andMe uses cookies (including other tracking technologies) for
targeted or cross-context behavioral advertising. Cookies require your Web-Behavior
Information to work.

Under the CCPA, this use of your data for cross-context behavioral advertising may
constitute a "sale" or "sharing" of personal information. We let advertising providers collect
identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, app
usage), device data, and geolocation data through our sites and apps when you use our
online service. In the past 12 months, these categories of personal information may have
been "sold" or "shared" as defined under CCPA. We do not have actual knowledge of selling
or sharing personal information of users under the age of 16.

23andMe believes in providing you with a frictionless experience by responding to Global
Privacy Control ("GPC") signals sent by your browser or mobile device. A GPC is a signal
from your browser that notifies us of your privacy preferences, such as whether or not you
want us to drop cookies on your device. To check your GPC preferences, check out the
settings or extensions in your browser or mobile device. Learn more about [GPC](#). Otherwise
you can always opt-out of cross-context behavioral or targeted advertising any time via
the [Cookie Choices](#) page.

Notice of Financial Incentive

We may provide special offers and benefits to certain customers. For example, a customer
may be invited to get a free kit via a discount code or special promotion. Such offers and
benefits are voluntary and customers can choose not to accept the free kit. If a customer
accepts a free kit, they can choose to close their account at any time via Account Settings or
by contacting us at privacy@23andme.com. We collect the same Personal Information from
a customer with a free kit as a customer who purchased their kit from us. Both customers'
Personal Information will be handled as detailed in this Policy.

While we do not assign a monetary value to the personal information we collect from a
customer with a free kit, we do receive value in the form of customer loyalty, Research
participation (if they choose to opt-in to Research), and increased engagement. The value of
the personal information that we collect is reasonably related to the expenses related to our
offering to you. This value will vary by customer depending on their engagement on the
23andMe Services, and many other factors.

File a complaint under the California Genetic Information Privacy Act or the Virginia Genetic Information Privacy Act

We encourage you to reach out to us with any complaints or concerns at privacy@23andme.com. Residents of the state of California or the state of Virginia may also file complaints if they believe certain rights were infringed under the California Genetic Information Privacy Act or the Virginia Genetic Information Privacy Act.

If you are a California resident, you may file a complaint with the California Attorney General, or your California county district attorney. Residents of cities with more than 750,000 residents may file a complaint with their city attorney, and residents of cities with full-time city prosecutors may file a complaint with their city prosecutor. If you wish to file a complaint with your district attorney, city attorney, or city prosecutor, contact their local office for more information.

If you are a Virginia resident, you may file a complaint with the [Virginia Attorney General](#), or contact the Virginia Consumers Protection Hotline at 1-800-552-9963.

2. What We Collect

As detailed in our Privacy Statement, we collect Personal Information for various purposes with privacy principles in mind.

Below, we describe the categories of Personal Information as defined under the CCPA for California residents, and may include reference to certain key definitions from our Privacy Statement. Some of the categories below require separate opt-in consent and these categories do not necessarily reflect all of the types of information that we may collect about you. We will provide you a separate notice if we collect any additional Personal Information about you. Some Personal Information included in the categories may overlap with other categories.

In the last twelve (12) months, we have collected the following categories of Personal Information:

- **Identifiers:** Registration Information and information contained in Web-Behavior Information and/or User Content such as your name, display name, address, online identifier, IP address, email address, username, or other similar identifiers.
- **Personal information categories listed in the California Customer Records provisions:** Certain information from Registration Information (including payment information), certain User Content (such as your name, address, or phone number), and/or certain Self-Reported Information (such as details about your employment or education).
- **Characteristics of protected classifications under California or federal law:** Certain information from Registration Information, Self-Reported Information, and/or User Content, such as your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information). You can review protected classes under California law [here](#).

- **Commercial information:** Certain information from Self-Reported Information and/or User Content such as products or Services purchased, obtained, or considered, survey responses regarding past purchasing history, information about products you purchased or considered, or other purchasing or consuming histories or tendencies.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** Certain information from Self-Reported Information and/or User Content you provide to us through surveys or other engagement on our platform, such as when you upload a profile picture.
- **Professional or employment-related information:** Certain information from Self-Reported Information and/or User Content such as education, household income, occupation, and other professional information. This information can be collected when you apply for a job with 23andMe, fill out a survey, or otherwise engage with us.
- **Biometric information:** Certain information from Self-Reported Information and/or User Content such as physiological, behavioral, and biological characteristics that can be used to establish an individual's identity. To the extent we collect this information, we collect it directly from you when you choose to share it with us.
- **Internet or other electronic network activity information:** Web-Behavior Information such as data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.
- **Geolocation data:** Web-Behavior Information that includes the identification or estimation of physical location or movement.
- **Inferences drawn from other personal information:** Inferences and Derived Data includes any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data. 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.
- **Sensitive personal information:** Genetic Information, and certain Registration Information, Sample Information, and Self-Reported Information may be considered "sensitive." This includes data that reveals your: social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to your account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; mail, email, and/or text messaging contents where 23andMe is not an intended recipient; and genetic data.

23andMe may access publicly available information or public records from federal, state, or local government records (e.g., vital records, census data).

3. How We Use Your Personal Information

As defined under the CCPA for California residents, 23andMe may use Personal Information listed above for the purposes described below or at your direction. Such purposes include:

- **Providing Services:** To provide our Services to you, including maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, and

- **Audit:** Auditing related to a current interaction and concurrent transactions, or compliance with applicable laws or standards.
- **Security and Integrity:** Detecting security incidents, maintaining integrity, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **Transient Use:** Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.
- **Advertising and Marketing:** To provide advertising and marketing to you, including cross-context behavioral advertising. Check out our [Cookie Choices](#) for more information on how we use your Web-Behavior Information for cross-context behavioral advertising.
- **Research and Development:** Internal research that 23andMe performs to improve and develop its products and services.
- **Quality Assurance and Product Improvement:** Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may use, disclose, or share your Personal Information for commercial or research purposes to third parties. The purpose, such as recruitment for external research or participation in 23andMe Research, may vary and will be described in the consent at that time.

In the past 12 months, we have disclosed Personal Information to service providers and contractors for the business purposes described above, and to third-party advertising and marketing companies for cross-context behavioral or targeted advertising.

We do not use or disclose sensitive Personal Information for purposes other than the business purposes permitted by CCPA, which include, for example, to perform our services, to detect and prevent security incidents, to perform services on behalf of the business, and other purposes as allowed by CCPA.

4. Changes to this notice

23andMe will periodically review and update this notice. We recommend visiting this page to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website. Click [here](#) to view the older version of this notice.

Washington Consumer Health Data Privacy Policy

If you are a Washington resident, the Washington My Health My Data Act (“WAMHMD”) requires us to provide you with the following additional information about: (1) the categories of “Consumer Health Data” (as defined in the WAMHMDA) we collect including how we use the data; (2) the categories of sources from which the consumer health data are collected (3)

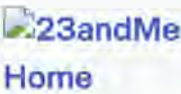
Consumer Health Data we Collect	Source	Purpose of Use and Collection	Categories of third-parties with whom we share
Individual health conditions, treatment, diseases, or diagnosis; Social, psychological, behavioral, and medical interventions; Health-related surgeries or procedures; Use or purchase of prescribed medication; Bodily functions, vital signs, symptoms, or measurements of other Consumer Health Data; Diagnoses or diagnostic testing, treatment, or medication; Gender-affirming care information; Reproductive or sexual health information	Self-Reported (if you choose to complete our health surveys)	Provide and manage the Services; Analyze and improve the Services;	We do not share this information unless you direct us to; if directed by you, we will provide to Lemonaid Health, an affiliate of 23andMe.
Biometric data	Self-Reported (if you choose) *For Totalheath customers only* Generated by our identity verification provider on behalf of 23andMe with your consent as you sign up for the TotalHealth services	Provide and manage the Services; Verify your identify	We do not share this information unless you direct us to
Bio sample and genetic data	Bio sample is provided by you as you sign up for our services; genetic data is generated by 23andMe based on your bio sample	Provide our services	We do not share this information unless you direct us to; if directed by you, we will provide to Lemonaid Health, an affiliate of 23andMe.
Customer Health Data “derived or extrapolated from nonhealth information (such as proxy, derivative, inferred, or emergent data by any means, including algorithms or machine learning) We only collect and use this information with your express consent to our Personalized Recommendations terms	This information is generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.	Provide and manage the Services; Analyze and improve the Services; Advertising and marketing	Analytics and advertising partners

Your Rights

- You have the right to confirm whether we collect your Consumer Health Data, how we use it, and whether we shared or sold it, including the contact information of any third parties to whom we shared or sold your Consumer Health Data. You also have the right to obtain a copy of that Consumer Health Data free of charge.
- You have the right to withdraw your consent from our collection and sharing of Consumer Health Data.
- You have the right to have your Consumer Health Data deleted.

If for any reason we decline a request you make while exercising these rights, you have the right to appeal our decision. If you are a Washington resident, you may file a complaint with the [Washington Attorney General](#), or contact the Washington Consumers Protection Hotline at 1-800-551-4636.

To exercise any of these rights, you may utilize the controls in your 23andMe Account Settings or email privacy@23andMe.com



Services

- Health + Ancestry
- Ancestry Service
- 23andMe+ Premium
- 23andMe+ Total Health
- Gifts
- Merchandise

Company

- Investors
- Media Center
- Blog
- Careers
- Refer a Friend
- Return & Refund Policy
- Customer Care
- FSA/HSA Eligibility
- Site Map

Learn

- About Us
- How it Works
- Science
- Privacy
- Research
- Stories
- Surname Discovery
- Diversity, Equity & Inclusion
- Genetics Learning Hub
- DNA & Personalized Healthcare


Legal


- Bar Date Notice
- Important Test Info
- Terms of Service
- Privacy Statement
- Data Protection
- Family Considerations
- Research Consent
- Individual Data Consent
- Biobanking Consent
- Cookie Policy
- Cookie Choices
- Patent Information
- Report a Security Issue
- Consumer Health Data Privacy Policy

Partner With Us

- Healthcare Professionals
- Scientists
- Business Development

Download App

 Download on the
Apple App Store

 Download on
Google Play

For Information about the Deadline to File a Proof of Claim [See Here](#)



United States | [Change](#)



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Exhibit 24



[Shop](#)

Privacy Notice for U.S. State Residents

Last Updated: June 2, 2023

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- Not receive discriminatory treatment if you exercise your privacy rights.

We make it easy to exercise your rights to ~~know, access, and delete~~ your Personal Information by making them available through your Account Settings. To access Account Settings, you must **log in** to your 23andMe account.

If you do not have a 23andMe account and would like to make a privacy rights request, or to appeal an action we made related to your privacy request, you can email us at privacy@23andme.com with the subject line “Privacy Rights Request”. We will require some additional information to verify your identity in order to process your request. Alternatively, you may exercise your privacy rights through an authorized agent. If you use an authorized agent, we will require you to verify your identity and confirm that you have provided the authorized agent permission to submit the request on your behalf.

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If you are a Virginia resident, you may file a complaint with the [Virginia Attorney General](#), or contact the Virginia Consumers Protection Hotline at 1-800-552-9963.

2. What We Collect

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- **Personal information categories listed in the California Customer Records provisions:** Certain information from Registration Information (including payment information), certain User Content (such

- **Characteristics of protected classifications under California or federal law:** Certain information from Registration Information, Self-Reported Information, and/or User Content, such as your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information). You can review protected classes under California law [here](#).
- **Commercial information:** Certain information from Self-Reported Information and/or User Content such as products or Services purchased, obtained, or considered, survey responses regarding past purchasing history, information about products you purchased or considered, or other purchasing or consuming histories or tendencies.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** Certain information from Self-Reported Information and/or User Content you provide to us through surveys or other engagement on our platform, such as when you upload a profile picture.
- **Professional or employment-related information:** Certain information from Self-Reported Information and/or User Content such as education, household income, occupation, and other professional information. This information can be collected when you apply for a job with 23andMe, fill out a survey, or otherwise engage with us.
- **Biometric information:** Certain information from Self-Reported Information and/or User Content such as physiological, behavioral, and biological characteristics that can be used to establish an individual's identity. To the extent we collect this information, we collect it directly from you when you choose to share it with us.
- **Internet or other electronic network activity information:** Web-Behavior Information such as data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.
- **Geolocation data:** Web-Behavior Information that includes the identification or estimation of physical location or movement.
- **Inferences drawn from other personal information:** Inferences and Derived Data includes any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data. 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.
- **Sensitive personal information:** Genetic Information, and certain Registration Information, Sample Information, and Self-Reported Information may be considered "sensitive." This includes data that reveals your: social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or

access code, password, or credentials allowing access to your account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; mail, email, and/or text messaging contents where 23andMe is not an intended recipient; and genetic data.

23andMe may access publicly available information or public records from federal, state, or local government records (e.g., vital records, census data).

3. How We Use Your Personal Information

As defined under the CCPA for California residents, 23andMe may use Personal Information listed above for the purposes described below or at your direction. Such purposes include:

- **Providing Services:** To provide our Services to you, including maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, and more.
- **Audit:** Auditing related to a current interaction and concurrent transactions, or compliance with applicable laws or standards.
- **Security and Integrity:** Detecting security incidents, maintaining integrity, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **Transient Use:** Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.
- **Advertising and Marketing:** To provide advertising and marketing to you, including cross-context behavioral advertising. Check out our [Cookie Choices](#) for more information on how we use your Web-Behavior Information for cross-context behavioral advertising.
- **Research and Development:** Internal research that 23andMe performs to improve and develop its products and services.
- **Quality Assurance and Product Improvement:** Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may use, disclose, or share your Personal Information for commercial or research purposes to third parties. The purpose, such as recruitment for external research or participation in 23andMe Research, may vary and will be described in the consent at that time.

In the past 12 months, we have disclosed Personal Information to service providers and contractors for the business purposes described above, and to third-party advertising and marketing companies for cross-context behavioral or targeted advertising.

We do not use or disclose sensitive Personal Information for purposes other than the business purposes permitted by CCPA, which include, for example, to perform our services, to detect and prevent security incidents, to perform services on behalf of the business, and other purposes as allowed by CCPA.

4. Changes to this notice

23andMe will periodically review and update this notice. We recommend visiting this page to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website. Click [here](#) to view the older version of this notice.



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Exhibit 25



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Privacy Notice for U.S. State Residents

Last Updated: March 30, 2023

Summary

This Privacy Notice for U.S. State Residents applies to residents of California, Colorado, and Virginia, and contains information required by the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, Colorado Privacy Act (“CPA”), and Virginia Consumer Data Protection Act (“VCDPA”) (collectively, “U.S. State Data Protection Laws”), as amended or replaced from time to time, along with any implementing regulations, and supplements our [Privacy Statement](#).

This policy, together with the 23andMe Privacy Statement, includes the information and disclosures we are required to provide to you under U.S. State Data Protection Laws. You should read them both carefully.

23andMe applies certain privacy controls to all U.S. customers. For example, all customers can request a copy of their data, request deletion, and control their privacy settings in their Account Settings. This notice makes sure we cover state-specific requirements. In the event of any conflict between the terms of this notice and the Privacy Statement, the terms of this notice prevail.

Here is a summary before we dive into the details:

- You have the right to know whether we sell or share your Personal Information and opt-out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com

Contents

1. **Your Rights**
2. **What We Collect**
3. **How We Use Your Personal Information**
4. **Changes to this notice**

1. Your Rights

When we talk about “Personal Information” in this notice, we mean any information that identifies, relates to, describes, is capable of being associated with you, or could reasonably be linked, directly or indirectly, with you, and as otherwise defined in the U.S. State Data Protection Laws. The U.S. State Data Protection Laws do not consider publicly available information, deidentified, or aggregate consumer information as “Personal Information.”

We will not attempt to reidentify deidentified information (except as necessary to test our deidentification processes to ensure no individuals can be identified) and will use it only in deidentified form.

Let’s start with your privacy rights first. You have the right to:

- Know what Personal Information we collect, use, disclose, share, or sell.
- Receive a copy of your Personal Information.
- Correct inaccurate Personal Information.
- Delete your Personal Information.
- Receive your Personal Information in a portable and, if technically feasible, in a readily usable format.
- Opt out of: targeted advertising; the sale or sharing of your Personal Information with third parties; and/or, profiling in the furtherance of decisions that produce legal or similarly significant effects. Please see our **Cookie Choices** page for more information.
- Limit the use and sharing of your sensitive Personal Information. Sensitive Personal Information includes, but is not limited to, Personal Information that reveals your racial or ethnic origin, religious beliefs, mental or health conditions or diagnosis, sex life or sexual orientation, citizenship or immigration status, genetic data, precise geolocation, or as otherwise defined in applicable U.S. State Data Protection Laws. Your 23andMe Registration Information, Genetic Information, and Self-Reported information likely include sensitive Personal Information.
- Not receive discriminatory treatment if you exercise your privacy rights.

We make it easy to exercise your rights to **know**, **correct**, and **delete** your Personal Information by making them available through your Account Settings. To access Account Settings, you must **log in** to your 23andMe account.

If you do not have a 23andMe account and would like to make a privacy rights request, or to appeal an action we made related to your privacy request, you can email us at privacy@23andme.com with the subject line "Privacy Rights Request". We will require some additional information to verify your identity in order to process your request. Alternatively, you may exercise your privacy rights through an authorized agent. If you use an authorized agent, we will require you to verify your identity and confirm that you have provided the authorized agent permission to submit the request on your behalf.

We will respond to your request within 45 days, and in more difficult cases we may extend our response time by another 45 days. The easiest way to exercise your rights is through your Account Settings so we can quickly verify your identity. Your rights under the U.S. State Data Protection Laws are not absolute and 23andMe may exercise limitations or exemptions as permitted by the U.S. State Data Protection Laws.

Notice of Right to Opt-Out of Sale/Sharing

Like many websites, 23andMe uses cookies (including other tracking technologies) for targeted or cross-context behavioral advertising. Cookies require your Web-Behavior Information to work.

Under the CCPA, this use of your data for cross-context behavioral advertising may constitute a "sale" or "sharing" of personal information. We let advertising providers collect identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, app usage), device data, and geolocation data through our sites and apps when you use our online service. In the past 12 months, these categories of personal information may have been "sold" or "shared" as defined under CCPA. We do not have actual knowledge of selling or sharing personal information of users under the age of 16.

23andMe believes in providing you with a frictionless experience by responding to Global Privacy Control ("GPC") signals sent by your browser or mobile device. A GPC is a signal from your browser that notifies us of your privacy preferences, such as whether or not you want us to drop cookies on your device. To check your GPC preferences, check out the settings or extensions in your browser or mobile device. Learn more about [GPC](#). Otherwise you can always opt-out of cross-context behavioral or targeted advertising any time via the [Cookie Choices](#) page.

Notice of Financial Incentive

We may provide special offers and benefits to certain customers. For example, a customer may be invited to get a free kit via a discount code or special promotion. Such offers and benefits are voluntary and customers can choose not to accept the free kit. If a customer accepts a free kit, they can choose to close their account at any time via Account Settings or by contacting us at privacy@23andme.com. We collect the same Personal Information from a customer with a free kit as a customer who purchased their kit from us. Both customers' Personal Information will be handled as detailed in this Policy.

While we do not assign a monetary value to the personal information we collect from a customer with a free kit, we do receive value in the form of customer loyalty, Research participation (if they choose to opt-in to Research), and increased engagement. The value of the personal information that we collect is reasonably

related to the expenses related to our offering to you. This fee will vary by customer depending on their engagement on the 23andMe Services, and many other factors.

2. What We Collect

As detailed in our Privacy Statement, we collect Personal Information for various purposes with privacy principles in mind.

Below, we describe the categories of Personal Information as defined under the CCPA for California residents, and may include reference to certain key definitions from our Privacy Statement. Some of the categories below require separate opt-in consent and these categories do not necessarily reflect all of the types of information that we may collect about you. We will provide you a separate notice if we collect any additional Personal Information about you. Some Personal Information included in the categories may overlap with other categories.

In the last twelve (12) months, we have collected the following categories of Personal Information:

- **Identifiers:** Registration Information and information contained in Web-Behavior Information and/or User Content such as your name, display name, address, online identifier, IP address, email address, username, or other similar identifiers.
- **Personal information categories listed in the California Customer Records provisions:** Certain information from Registration Information (including payment information), certain User Content (such as your name, address, or phone number), and/or certain Self-Reported Information (such as details about your employment or education).
- **Characteristics of protected classifications under California or federal law:** Certain information from Registration Information, Self-Reported Information, and/or User Content, such as your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information). You can review protected classes under California law [here](#).
- **Commercial information:** Certain information from Self-Reported Information and/or User Content such as products or Services purchased, obtained, or considered, survey responses regarding past purchasing history, information about products you purchased or considered, or other purchasing or consuming histories or tendencies.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** Certain information from Self-Reported Information and/or User Content you provide to us through surveys or other engagement on our platform, such as when you upload a profile picture.
- **Professional or employment-related information:** Certain information from Self-Reported Information and/or User Content such as education, household income, occupation, and other professional information. This information can be collected when you apply for a job with 23andMe, fill out a survey, or otherwise engage with us.

- **Biometric information:** Certain information collected from Self-Reported Information and/or User Content such as physiological, behavioral, and biological characteristics that can be used to establish an individual's identity. To the extent we collect this information, we collect it directly from you when you choose to share it with us.
- **Internet or other electronic network activity information:** Web-Behavior Information such as data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.
- **Geolocation data:** Web-Behavior Information that includes the identification or estimation of physical location or movement.
- **Inferences drawn from other personal information:** Inferences and Derived Data includes any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data. 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.
- **Sensitive personal information:** Genetic Information, and certain Registration Information, Sample Information, and Self-Reported Information may be considered "sensitive." This includes data that reveals your: social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to your account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; mail, email, and/or text messaging contents where 23andMe is not an intended recipient; and genetic data.

3. How We Use Your Personal Information

As defined under the CCPA for California residents, 23andMe may use Personal Information listed above for the purposes described below or at your direction. Such purposes include:

- **Providing Services:** To provide our Services to you, including maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, and more.
- **Audit:** Auditing related to a current interaction and concurrent transactions, or compliance with applicable laws or standards.
- **Security and Integrity:** Detecting security incidents, maintaining integrity, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **Transient Use:** Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.

- **Advertising and Marketing:** To provide advertising and marketing to you, including cross-context behavioral advertising. Check out our [Cookie Choices](#) for more information on how we use your Web-Behavior Information for cross-context behavioral advertising.
- **Research and Development:** Internal research that 23andMe performs to improve and develop its products and services.
- **Quality Assurance and Product Improvement:** Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may use, disclose, or share your Personal Information for commercial or research purposes to third parties. The purpose, such as recruitment for external research or participation in 23andMe Research, may vary and will be described in the consent at that time.

In the past 12 months, we have disclosed Personal Information to service providers and contractors for the business purposes described above, and to third-party advertising and marketing companies for cross-context behavioral or targeted advertising.

We do not use or disclose sensitive Personal Information for purposes other than the business purposes permitted by CCPA, which include, for example, to perform our services, to detect and prevent security incidents, to perform services on behalf of the business, and other purposes as allowed by CCPA.

4. Changes to this notice

23andMe will periodically review and update this notice. We recommend visiting this page to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website. Click [here](#) to view the older version of this notice.



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Exhibit 26

Privacy Notice for U.S. State Residents

Last Updated: December 14, 2022

Summary

This Privacy Notice for U.S. State Residents applies to residents of California, Colorado, and Virginia, and contains information required by the California Privacy Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act, Colorado Privacy Act ("CPA"), and Virginia Consumer Data Protection Act ("VCDPA") (collectively, "U.S. State Data Protection Laws"), as amended or replaced from time to time, along with any implementing regulations, and supplements our [Privacy Statement \(https://web.archive.org/web/20230324153004/https://www.23andme.com/legal/privacy/\)](https://web.archive.org/web/20230324153004/https://www.23andme.com/legal/privacy/).

This policy, together with the 23andMe Privacy Statement, includes the information and disclosures we are required to provide to you under U.S. State Data Protection Laws. You should read them both carefully.

23andMe applies certain privacy controls to all U.S. customers. For example, all customers can request a copy of their data, request deletion, and control their privacy settings in their Account Settings. This notice makes sure we cover state specific requirements. In the event of any conflict between the terms of this notice and the Privacy Statement, the terms of this notice prevail.

Here is a summary before we dive into the details:

- You have the right to know whether we sell or share your Personal Information and opt out of a sale or sharing of your Personal Information with a third party.
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You have a right to limit use and sharing of your sensitive Personal Information.
- You have the right to access your Personal Information and get a copy of it.
- You have the right to correct inaccurate Personal Information.
- You have the right to delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com (<https://web.archive.org/web/20230324153004/mailto:privacy@23andme.com>).

Contents

1. [Your Rights](#)
2. [What We Collect](#)
3. [How We Use Your Personal Information](#)
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1. Your Rights

When we talk about "Personal Information" in this notice, we mean any information that identifies, relates to, describes, is capable of being associated with you, or could reasonably be linked, directly or indirectly, with you, and as otherwise defined in the U.S. State Data Protection Laws. The U.S. State Data Protection Laws do not consider publicly available information, deidentified, or aggregate consumer information as "Personal Information."

We will not attempt to reidentify deidentified information (except as necessary to test our deidentification processes to ensure no individuals can be identified) and will use it only in deidentified form.

Let's start with your privacy rights first. You have the right to:

- Know what Personal Information we collect, use, disclose, share, or sell.
- Receive a copy of your Personal Information.
- Correct inaccurate Personal Information.
- Delete your Personal Information.
- Receive your Personal Information in a portable and, if technically feasible, in a readily usable format.
- Opt out of: targeted advertising; the sale or sharing of your Personal Information with third parties; and/or, profiling in the furtherance of decisions that produce legal or similarly significant effects. Please see our [Cookie Choices](#)

- Limit the use and sharing of your sensitive Personal Information. Sensitive Personal Information includes, but is not limited to, Personal Information that reveals your racial or ethnic origin, religious beliefs, mental or health conditions or diagnosis, sex life or sexual orientation, citizenship or immigration status, genetic data, precise geolocation, or as otherwise defined in applicable U.S. State Data Protection Laws. Your 23andMe Registration Information, Genetic Information, and Self Reported information likely include sensitive Personal Information.
- Not receive discriminatory treatment if you exercise your privacy rights.

We make it easy to exercise your rights to know (https://web.archive.org/web/20230324153004/https://customer.care.23andme.com/hc/en-us/articles/212196868_Accessing_Your_Raw_Genetic_Data), correct (<https://web.archive.org/web/20230324153004/https://you.23andme.com/user/>), and delete (https://web.archive.org/web/20230324153004/https://customer.care.23andme.com/hc/en-us/articles/212170688_Requesting_23andMe_Account_Closure) your Personal Information by making them available through your Account Settings. To access Account Settings, you must log in (<https://web.archive.org/web/20230324153004/https://you.23andme.com/user/edit/records/>) to your 23andMe account.

If you do not have a 23andMe account and would like to make a privacy rights request, or to appeal an action we made related to your privacy request, you can email us at privacy@23andme.com (<https://web.archive.org/web/20230324153004/mailto:privacy@23andme.com>) with the subject line “Privacy Rights Request”. We will require some additional information to verify your identity in order to process your request. Alternatively, you may exercise your privacy rights through an authorized agent. If you use an authorized agent, we will require you to verify your identity and confirm that you have provided the authorized agent permission to submit the request on your behalf.

We will respond to your request within 45 days, and in more difficult cases we may extend our response time by another 45 days. The easiest way to exercise your rights is through your Account Settings so we can quickly verify your identity. Your rights under the U.S. State Data Protection Laws are not absolute and 23andMe may exercise limitations or exemptions as permitted by the U.S. State Data Protection Laws.

Notice of Right to Opt-Out of Sale/Sharing

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Under the CCPA, this use of your data for cross context behavioral advertising may constitute a “sale” or “sharing” of personal information. We let advertising providers collect identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, app usage), device data, and geolocation data through our sites and apps when you use our online service. In the past 12 months, these categories of personal information may have been “sold” or “shared” as defined under CCPA. We do not have actual knowledge of selling or sharing personal information of users under the age of 16.

23andMe believes in providing you with a frictionless experience by responding to Global Privacy Control (“GPC”) signals sent by your browser or mobile device. A GPC is a signal from your browser that notifies us of your privacy preferences, such as whether or not you want us to drop cookies on your device. To check your GPC preferences, check out the settings or extensions in your browser or mobile device. Learn more about GPC (<https://web.archive.org/web/20230324153004/https://globalprivacycontrol.org/>). Otherwise you can always opt out of cross context behavioral or targeted advertising any time via the Cookie Choices (https://web.archive.org/web/20230324153004/https://www.23andme.com/about/cookie_choices/) page.

Notice of Financial Incentive

We may provide special offers and benefits to certain customers. For example, a customer may be invited to get a free kit via a discount code or special promotion. Such offers and benefits are voluntary and customers can choose not to accept the free kit. If a customer accepts a free kit, they can choose to close their account at any time via Account Settings or by contacting us at privacy@23andme.com (<https://web.archive.org/web/20230324153004/mailto:privacy@23andme.com>). We collect the same Personal Information from a customer with a free kit as a customer who purchased their kit from us. Both customers’ Personal Information will be handled as detailed in this Policy.

While we do not assign a monetary value to the personal information we collect from a customer with a free kit, we do receive value in the form of customer loyalty, Research participation (if they choose to opt in to Research), and increased engagement. The value of the personal information that we collect is reasonably related to the expenses related to our offering to you. This value will vary by customer depending on their engagement on the 23andMe Services, and many other factors.

2. What We Collect

As detailed in our Privacy Statement, we collect Personal Information for various purposes with privacy principles in mind.

Below, we describe the categories of Personal Information as defined under the CCPA for California residents, and may include reference to certain key definitions from our Privacy Statement. Some of the categories below require separate opt in consent and these categories do not necessarily reflect all of the types of information that we may collect about you. We will provide you a separate notice if we collect any additional Personal Information about you. Some Personal Information included in the categories may overlap with other categories.

In the last twelve (12) months, we have collected the following categories of Personal Information:

- **Identifiers:** Registration information and information contained in Web Behavior Information and/or User Content such as your name, display name, address, online identifier, IP address, email address, username, or other similar identifiers.
- **Personal information categories listed in the California Customer Records provisions:** Certain information from Registration Information (including payment information), certain User Content (such as your name, address, or phone number), and/or certain Self Reported Information (such as details about your employment or education).
- **Characteristics of protected classifications under California or federal law:** Certain information from Registration Information, Self Reported Information, and/or User Content, such as your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information). You can review protected classes under California law [here \(https://web.archive.org/web/20230324153004/https://www.senate.ca.gov/content/protected_classes\)](https://web.archive.org/web/20230324153004/https://www.senate.ca.gov/content/protected_classes).
- **Commercial information:** Certain information from Self Reported Information and/or User Content such as products or Services purchased, obtained, or considered, survey responses regarding past purchasing history, information about products you purchased or considered, or other purchasing or consuming histories or tendencies.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** Certain information from Self Reported Information and/or User Content you provide to us through surveys or other engagement on our platform, such as when you upload a profile picture.
- **Professional or employment-related information:** Certain information from Self Reported Information and/or User Content such as education, household income, occupation, and other professional information. This information can be collected when you apply for a job with 23andMe, fill out a survey, or otherwise engage with us.
- **Biometric information:** Certain information from Self-Reported Information and/or User Content such as physiological, behavioral, and biological characteristics that can be used to establish an individual's identity. To the extent we collect this information, we collect it directly from you when you choose to share it with us.
- **Internet or other electronic network activity information:** Web-Behavior Information such as data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.
- **Geolocation data:** Web-Behavior Information that includes the identification or estimation of physical location or movement.
- **Inferences drawn from other personal information:** Inferences and Derived Data includes any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data. 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.
- **Sensitive personal information:** Genetic Information, and certain Registration Information, Sample Information, and Self-Reported Information may be considered "sensitive." This includes data that reveals your: social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to your account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; mail, email, and/or text messaging contents where 23andMe is not an intended recipient; and genetic data.

3. How We Use Your Personal Information

As defined under the CCPA for California residents, 23andMe may use Personal Information listed above for the purposes described below or at your direction. Such purposes include:

- **Providing Services:** To provide our Services to you, including maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, and more.
- **Audit:** Auditing related to a current interaction and concurrent transactions, or compliance with applicable laws or standards.
- **Security and Integrity:** Detecting security incidents, maintaining integrity, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **Transient Use:** Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.
- **Advertising and Marketing:** To provide advertising and marketing to you, including cross-context behavioral advertising. Check out our [Cookie Choices \(https://web.archive.org/web/20230324153004/https://www.23andme.com/about/cookie-choices/\)](https://web.archive.org/web/20230324153004/https://www.23andme.com/about/cookie-choices/) for more information on how we use your Web-Behavior Information for cross-context behavioral advertising.
- **Research and Development:** Internal research that 23andMe performs to improve and develop its products and services.
- **Quality Assurance and Product Improvement:** Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may use, disclose, or share your Personal Information for commercial or research purposes to third parties. The purpose, such as recruitment for external research or participation in 23andMe Research, may vary and will be described in the consent at that time.

We do not use or disclose sensitive Personal Information for purposes other than the business purposes permitted by CCPA, which include, for example, to perform our services, to detect and prevent security incidents, to perform services on behalf of the business, and other purposes as allowed by CCPA.

4. Changes to this notice

23andMe will periodically review and update this notice. We recommend visiting this page to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website. Click [here \(2version=1.1\)](#) to view the older version of this notice.



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SERVICES

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[Gifts \(/web/20230324153004/https://www.23andme.com/gifts/\)](https://www.23andme.com/gifts/)

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[Genetics Learning Hub \(/web/20230324153004/https://www.23andme.com/topics/\)](https://www.23andme.com/topics/)

[Careers \(/web/20230324153004/https://www.23andme.com/careers/\)](https://www.23andme.com/careers/)

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[Site Map \(/web/20230324153004/https://www.23andme.com/sitemap/\)](https://www.23andme.com/sitemap/)

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[Data Protection \(/web/20230324153004/https://www.23andme.com/gdpr/\)](https://www.23andme.com/gdpr/)

[Family Considerations \(https://web.archive.org/web/20230324153004/https://customer.23andme.com/hc/en-us/articles/202907980\)](https://customer.23andme.com/hc/en-us/articles/202907980)

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[Individual Data Consent \(/web/20230324153004/https://www.23andme.com/about/individual-data-consent/\)](https://www.23andme.com/about/individual-data-consent/)

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Exhibit 27

Privacy Notice for California Residents

Last Updated: August 2, 2022

Summary

This Privacy Notice for California Residents contains information required by the California Privacy Consumer Privacy Act ("CCPA"), as amended or replaced from time to time, along with any implementing regulations, and supplements our [Privacy Statement](https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/#full_privacy_statement) (https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/#full_privacy_statement). 23andMe's privacy principles are the same for all customers. For example, all customers can request a copy of their data, request deletion, and control their privacy settings in their Account Settings. This notice makes sure we cover California specific requirements. In the event of any conflict between the terms of this notice and the Privacy Statement, the terms of this notice prevail.

Here is a summary before we dive into the details:

- You have the right to know whether we sell your Personal Information and opt out of a sale if we do. But rest assured, **we do not sell your Personal Information.**
- You have the right to receive an overview of the Personal Information we collect, how we use it, and who we share it with.
- You can request access to your Personal Information, get a copy, and delete your Personal Information.
- You or your authorized agent can always contact us if you have a question at privacy@23andme.com (<https://web.archive.org/web/20221127182626/mailto:privacy@23andme.com>)

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1. Your Rights

When we talk about "Personal Information" in this notice, we mean any information that identifies, relates to, describes, is capable of being associated with you, or could reasonably be linked, directly or indirectly, with you, and as otherwise defined in the CCPA. The CCPA does not consider publicly available information as "Personal Information."

Let's start with your rights first. You have the right to:

- Know what Personal Information we collect, use, disclose, or sell.
- Receive a copy of your Personal Information.
- Delete your Personal Information.
- Not receive discriminatory treatment if you exercise your CCPA rights.

We make it easy to exercise your CCPA rights by making them available through your Account Settings. To access Account Settings, you must log in to your 23andMe account. Please see [Section 5 of the Privacy Statement](https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/#jump_link_content_your_choices) (https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/#jump_link_content_your_choices) for more guidance on exercising your choices through Account Settings.

If you do not have a 23andMe account and would like to make a CCPA rights request, you can email us at privacy@23andme.com (<https://web.archive.org/web/20221127182626/mailto:privacy@23andme.com>) with the subject line "CCPA Rights Request". We will require some additional information to verify your identity in order to process your request. Alternatively, you may exercise your CCPA rights through an authorized agent. If you use an authorized agent, we will require you to verify your identity and confirm that you have provided the authorized agent permission to submit the request on your behalf. We will respond to your request within 45 days, and in more difficult cases we may extend our response time by another 45 days. The easiest way to exercise your rights is through your Account Settings so we can quickly verify your identity. Your rights under the CCPA are not absolute and 23andMe may exercise limitations or exemptions as permitted by the CCPA.

23andMe does not sell Personal Information to third parties. The CCPA provides you with the right to know whether your Personal Information is being sold and to opt out of such sales.

As detailed in our Privacy Statement, we collect Personal Information for various purposes with privacy principles in mind. Choice and transparency are just as important to us as they are to you. The categories of Personal Information and other terms used below are defined in California Civil Code 1798.140, and may include reference to certain key definitions set forth in our Privacy Statement. Some of the categories below require separate opt in consent and these categories do not necessarily reflect all of the types of information that we may collect about you. We will provide you a separate notice if we collect any additional Personal Information from you!

In the last twelve (12) months, we have collected the following categories of Personal Information from our customers:

- **Identifiers:** Registration Information, Web Behavior Information, and/or User Content such as your name, display name, address, online identifier, IP address, email address, username, or other similar identifiers. We mainly use these to offer our Services, such as when you create an account with us, purchase our Services, or when you choose to connect with other customers of 23andMe.
- **Personal information categories listed in the California Customer Records provisions:** Registration Information, Self Reported Information, and/or User Content such as your name, address, phone number, Self Reported Information (such as details about your employment or education), and payment information (last 4 digits only). Some Personal Information included in this category may overlap with other categories. Similarly to the category above, we mainly use this information to offer our Services to you.
- **Characteristics of protected classifications under California or federal law:** Registration Information, Self Reported Information, and/or User Content such as your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information). You can review protected classes under California law [here](https://web.archive.org/web/20221127182626/https://www.senate.ca.gov/content/protected_classes) (https://web.archive.org/web/20221127182626/https://www.senate.ca.gov/content/protected_classes). Generally this information is collected because you provide it directly to us. Certain elements, including Genetic Information, ancestry, and sex, may be developed or analyzed by 23andMe in relation to our genetic testing services.
- **Commercial information:** Self Reported Information and/or User Content such as products or Services purchased, obtained, or considered, survey responses regarding past purchasing history, information you share on 23andMe forums about products you purchased or considered, or other purchasing or consuming histories or tendencies. For example, we may keep this information when you purchase products through 23andMe.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** Self Reported Information and/or User Content you provide to us through surveys or other engagement on our platform, such as when you upload a profile picture. Generally, this information is collected directly from you, or passively collected about you with your permission.
- **Professional or employment-related information:** Self Reported Information and/or User Content such as education, household income, occupation, and other professional information. This information can be collected when you apply for a job with 23andMe, fill out a survey, or otherwise engage with us.
- **Biometric information:** Self Reported Information and/or User Content such as physiological, behavioral, and biological characteristics that can be used to establish an individual's identity. To the extent we collect this information, we collect it directly from you when you choose to share it with us.
- **Internet or other electronic network activity information:** Web Behavior Information such as data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies. Such information may include your browser type, domains, page views, how long you spent on a page or feature of the website, or other data about your engagement with our Services.
- **Geolocation data:** Web Behavior Information that includes the identification or estimation of physical location or movement. You can learn more about how 23andMe processes Web Behavior Information in our [Cookie Policy](https://web.archive.org/web/20221127182626/https://www.23andme.com/about/cookies/) (<https://web.archive.org/web/20221127182626/https://www.23andme.com/about/cookies/>).
- **Inferences drawn from other personal information:** Inferences and Derived Data includes any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data. 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.

3. How We Use Your Personal Information

23andMe may share Personal Information listed above for operational business purposes or at your direction. Such business purposes include:

- **Providing Services:** To provide our Services to you, including maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, and more.
- **Audit:** Auditing related to a current interaction and concurrent transactions.
- **Security:** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity. Please see Section 4.e. of our [Privacy Statement](https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20221127182626/https://www.23andme.com/about/privacy/>) for more information.
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **Transient Use:** Short term, transient use, where personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction.
- **23andMe Product Research and Development:** Research that 23andMe performs to improve and develop its products and services.

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- **Quality Assurance and Product Improvement:** Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may share your Personal Information for commercial purposes. The purpose, such as recruitment for external research, may vary and will be described in the consent.

4. Changes to this notice

23andMe will periodically review and update this notice. We recommend visiting this page to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website. Click [here \(2version 1.0\)](#) to view the older version of this notice.



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[Ancestry + Traits \(/web/20221127182626/https://www.23andme.com/dna-ancestry/\)](#)

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COMPANY

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[Family Considerations](#)

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[Scientists \(/https://web.archive.org/web/20221127182626/https://research.23andme.com/\)](#)

[Therapeutics](#)

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Exhibit 28

Privacy Notice for California Residents

Effective Date: January 1, 2020

Summary

This Privacy Notice for California Residents supplements our [Privacy Statement](https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/#full_privacy_statement) (https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/#full_privacy_statement) and applies solely to 23andMe consumers, as defined below. In the event of any conflict between the terms of this notice and the Privacy Statement, the terms of this notice prevail.

This notice details the rights of California residents under the California Consumer Privacy Act of 2018 (CCPA).

If you have any questions regarding the information presented on this page, please contact 23andMe at privacy@23andme.com (<https://web.archive.org/web/20220812001810/mailto:privacy@23andme.com>).

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1. Key definitions

1. **Consumer:** natural persons who reside in California, including (1) individuals who are in California for other than a temporary and transitory purpose; and (2) individuals who are domiciled in California, but are outside the state for a temporary or transitory purpose.
2. **CCPA:** the California Consumer Privacy Act of 2018, effective as of January 1, 2020, as amended or replaced from time to time, along with any implementing regulations.
3. **Personal information:** as defined in the CCPA, and includes information that can be used to identify you, either alone or in combination with other information, and any other information that could reasonably be linked with a particular consumer or device.

2. Consumer rights

1. Notice and access.

As a consumer, you have the right to know:

- i. The categories of personal information we collect about you;
- ii. The categories of sources from which the information was collected;
- iii. The business or commercial purpose for collecting, disclosing, or selling personal information; and

iv. The categories of third parties we have disclosed personal information to for a business purpose and the categories of personal information disclosed.

You may request that 23andMe provide you access to the specific pieces of personal information collected about you in a readily usable format.

Your access rights under the CCPA are not absolute. Specifically, the CCPA limits the information you can request to personal information collected in the 12 month period preceding our receipt of the request. Additionally, under the CCPA, 23andMe is not obligated to respond to requests for access to personal information more than twice in a twelve month period.

23andMe may, in its sole discretion, choose to provide personal information in response to a consumer's access request that relate to a time period greater than the preceding 12 months or respond to a consumer request more frequently than required by law; choosing to do so, however, does not constitute an obligation to do so.

2. **Deletion.**

You may request that 23andMe delete the personal information we process about you, subject to certain limitations. Your personal information may not be deleted if the information is necessary to:

- i. Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- ii. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- iii. Debug products to identify and repair errors that impair existing intended functionality.
- iv. Ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- v. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- vi. Engage in public or peer reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- vii. To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- viii. Comply with a legal obligation.
- ix. Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

3. **Opt-out of sales.**

The CCPA provides you the right to opt out of having your personal information sold by a business. 23andMe does not sell personal information to third parties.

4. **Non-discrimination.**

The CCPA prohibits businesses from discriminating against a consumer for exercising their rights under the CCPA. 23andMe will not discriminate against you for exercising any of your CCPA rights.

5. **Designated methods for submitting rights requests.**

Access and deletion rights may be exercised within your 23andMe Account Settings. For additional details regarding account deletion, see Section 5.d. of our [Privacy Statement \(https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/\)](https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/).

If you have not created a 23andMe account, you may contact us directly to submit your request by emailing privacy@23andme.com (<https://web.archive.org/web/20220812001810/mailto:privacy@23andme.com>) with the subject line "CCPA Rights Request" or calling our Customer Care team at 1.800.239.5230.

6. **Verifying consumer requests.**

Only you or someone legally authorized to act on your behalf may make a verifiable consumer request related to your personal information. Your request must:

- i. Provide sufficient information that allows us to verify you are the person about whom we collected personal information or an authorized representative.
- ii. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Generally, requests submitted through your 23andMe account will be considered sufficiently verified when the request relates to personal information associated with that specific account. However, if you have not created, or no longer have access to your 23andMe account, we may request additional materials or information for the purposes of validating the authenticity of your request.

23andMe will use the information provided in connection with a verification request solely for the purposes of verification. We cannot effectuate your request if we are unable to verify your identity or authority to make the request and confirm that the personal information relates to you.

There may be other situations where 23andMe is unable or not required to effectuate your rights request. In such circumstances, 23andMe will respond to your request within the period required by the CCPA. The response will provide relevant details regarding 23andMe's determination and any additional, pertinent information about your request.

3. Categories of personal information collected

When you choose to use our Services, including visiting our website, we may collect and process your personal information. 23andMe has collected the following categories of personal information from its consumers within the last twelve (12) months as necessary to provide our Services and/or as otherwise allowed under our Privacy Statement. The categories of personal information and other terms used below are defined in California Civil Code 1798.140, and may include reference to certain key definitions set forth in our [Privacy Statement](https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/>).

1. Information you provide directly to us.

Information	Description	Business or commercial purpose(s) of collection	Business purpose(s) for disclosure
Identifiers	<ul style="list-style-type: none"> Registration Information, such as your name and email address. User Content, such as your government-issued ID which may be requested in exceptional circumstances to assist you in regaining access to your account. Web-Behavior Information, such as your device ID or IP address, automatically collected when you visit our website. <p>Generally identifiers are provided directly to us, collected automatically when you visit our website, or created on your behalf when you sign up for our Services to allow 23andMe to provide our Services.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services (Read more in our Privacy Statement (https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/link-content-using-information-to-provide-analyze-and-improve-our-services/)) Process, analyze and deliver your genetic testing results Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Identifiers are sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Security Debugging Transient use 23andMe Research Quality assurance and product improvement
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e))	<ul style="list-style-type: none"> Registration Information, such as your name and address. Self-Reported Information, such as details about your employment or education. User Content, such as your government-issued identification which may be requested in exceptional circumstances to assist you in regaining access your account. <p>Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Process, analyze and deliver your genetic testing results Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Provide you with marketing communications 	<p>California Customer Records information is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Transient use 23andMe Research Quality assurance and product improvement

Information	Description	Business purpose(s) for collection	Business purpose(s) for disclosure
Protected classification characteristics	<ul style="list-style-type: none"> Protected classification characteristics we process include age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information) <p>Generally this information is collected because you provide it directly to us. Certain elements, including Genetic Information, ancestry, and sex, may be developed or analyzed by 23andMe in relation to our genetic testing services. You can review protected classes under California Law here (https://web.archive.org/web/20220812001810/https://www.senate.ca.gov/content/protected-classes).</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Process, analyze and deliver your genetic testing results Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Protected classification characteristics are sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Transient use 23andMe Research Quality assurance and product improvement
Commercial information	<ul style="list-style-type: none"> Self-Reported Information, such as survey responses regarding past purchasing history. User Content, such as information you share on 23andMe forums about products you purchased or considered. <p>Generally, this information is collected directly from you.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Commercial information is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Transient use 23andMe Research Quality assurance and product improvement
Sensory data	<ul style="list-style-type: none"> Self-Reported Information including audio, electronic, visual, thermal, olfactory, or similar information. <p>Generally, this information is collected directly from you, or passively collected about you with your permission.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Sensory data is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> 23andMe Research Quality assurance and product improvement

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Information	Description	Business or commercial purpose(s) of collection	Business purpose(s) for disclosure
Professional, Education, or employment related information.	<ul style="list-style-type: none"> Self Reported Information including education, household income, occupation, and other professional information. <p>Generally, this information is collected directly from you.</p>	<ul style="list-style-type: none"> Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Professional, Education and employment related information is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> 23andMe Research Quality assurance and product improvement

2. **Information collected in relation to our genetic testing services.**

Information	Description	Business or commercial purpose(s) of collection	Business purpose(s) for disclosure
Biometric information	<ul style="list-style-type: none"> Genetic Information (your As, Cs, Ts, and Gs) Self-Reported Information about physiological, behavioral, and biological characteristics, or other identifier or identifying information, and sleep, health, or exercise data <p>Generally, this information is collected directly from you or developed or analyzed by 23andMe in relation to our genetic testing services.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Process, analyze and deliver your genetic testing results Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials 	<p>Biometric information is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit 23andMe Research Quality assurance and product improvement

3. **Information collected through tracking technology (e.g. from cookies and similar technologies).**

Information	Description	Purpose of Collection	Business purpose(s) for disclosure
Internet or other electronic network activity information	<ul style="list-style-type: none"> Web-Behavior Information, including data generated from your use of our Services and collected through log files, cookies, web beacons, and similar technologies, (e.g., browser type, domains, page views). <p>Our Cookie Policy (https://web.archive.org/web/20220812001810/https://www.23andme.com/about/cookies/) contains more information about how 23andMe processes Web-Behavior Information.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Internet information is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Debugging Transient use 23andMe Research Quality assurance and product improvement

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Information	Description	Purpose of Collection	Business purpose(s) for disclosure
Geolocation data	<ul style="list-style-type: none"> Web-Behavior Information that includes the identification or estimation of physical location or movement. <p>Our Cookie Policy (https://web.archive.org/web/20220812001810/https://www.23andme.com/about/cookies/) contains more information about how 23andMe processes Web-Behavior Information.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Provide customer support Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Geolocation data is sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Debugging Transient use 23andMe Research Quality assurance and product improvement

4. **Derived information created from other personal information.**

Information	Description	Purpose of Collection	Business purpose(s) for disclosure
Inferences and derived data	<p>Inferences and derived information are any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data.</p> <ul style="list-style-type: none"> 23andMe may derive Genetic Information, such as imputed genotype data, genetic risk scores, and phenotypes (which are observable characteristics or traits). <p>Generally this information is created by 23andMe and not collected directly from you. 23andMe may derive information from data that was collected in relation to our genetic testing services, directly from you, or through tracking technology.</p>	<ul style="list-style-type: none"> Provide you with Services and analyze and improve our Services Process, analyze and deliver your genetic testing results Allow you to share your Personal Information with others Allow you to share your Personal Information for research purposes Recruit you for external research Conduct surveys or polls, and obtain testimonials Provide you with marketing communications 	<p>Inferences and derived data are sometimes processed by our service providers for the following purposes:</p> <ul style="list-style-type: none"> Audit Security Debugging Transient use 23andMe Research Quality assurance and product improvement

5. **Disclosures of personal information for a business purpose**

23andMe may share information listed above under “**Categories of personal information collected**” with our service providers for operational business purposes including:

- i. Audit: Auditing related to a current interaction and concurrent transactions.
- ii. Security: Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity. Please see Section 4.e. of our [Privacy Statement](https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/) (<https://web.archive.org/web/20220812001810/https://www.23andme.com/about/privacy/>) for more information.
- iii. Debugging: Debugging to identify and repair errors that impair existing intended functionality.
- iv. Transient use: Short-term, transient use, where personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction.
- v. 23andMe Research: Scientific research that 23andMe performs with the intent to publish in a peer-reviewed scientific journal.
- vi. Quality assurance and product improvement: Activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by 23andMe, and otherwise to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 23andMe.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may disclose the categories of personal information detailed above for commercial purposes. The purpose, such as recruitment for external research, may vary and will be specified in the consent.

4. Changes to this notice

23andMe will review and update this notice at least once every 12 months and more frequently as needed. We recommend visiting this page periodically to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website.

5. Contact information

If you have questions about this notice, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com, or send a letter to:

Privacy Administrator
23andMe, Inc.
223 N. Mathilda Avenue
Sunnyvale, CA 94086
1.800.239.5230



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[Media Center](https://mediacenter.23andme.com/)

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[Family Considerations](https://customer.23andme.com/hc/en-us/articles/202907980)

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Biobanking Consent (/web/20220812001810/https://www.23andme.com/about/biobanking/).

Cookie Policy (/web/20220812001810/https://www.23andme.com/about/cookies/).

Ad Choices (/web/20220812001810/https://www.23andme.com/about/cookies/#5-what-are-my-privacy-options).

Patent Information (/web/20220812001810/https://www.23andme.com/patents/).

Report a Security Issue (/web/20220812001810/https://www.23andme.com/security-report/).

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